



**KIM HIN JOO (MALAYSIA) BERHAD**

Registration No. 197801000642 (37655-U)

**CORPORATE DISCLOSURE**

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**POLICY**

# CORPORATE DISCLOSURE POLICY

## 1.0 INTRODUCTION

Kim Hin Joo (Malaysia) Berhad (“**the Company**”) is committed to upholding high standards of transparency and promotion of investor confidence through the provision of comprehensive, accurate and quality information on a timely basis. In adopting this Policy, the Company has considered the recommendations contained in the Malaysian Code of Corporate Governance 2017 (“**MCCG 2017**”), the disclosure obligations contained in the ACE Market Listing Requirements (“**Listing Requirements**”) of Bursa Malaysia Securities Berhad (“**Bursa Securities**”) and the Corporate Disclosure Guide issued by Bursa Securities in September 2011.

## 2.0 RATIONALE AND OBJECTIVES

The primary objectives of the Corporate Disclosure Policy are:

- To promote and elevate a high standard of integrity and transparency through timely comprehensive, accurate, quality and full disclosure.
- To raise awareness and provide guideline to the Directors, Management and Employees of the Company on disclosure requirement and practice.
- To exercise due diligence to ensure the veracity of the information being disseminated is factual, accurate, clear, timely and comprehensive.
- To promote and maintain market integrity and investor confidence.
- To build good relationship with all stakeholders based on transparency, openness, trust and confidence.
- To ensure compliance with all applicable legal and regulatory requirements on disclosure of material information.

## 3.0 DISCLOSURE STRUCTURE AND RESPONSIBILITY

3.1 To achieve its objectives, the Company has adopted all forms of communication channels as outlined under 3.2 to 3.4 below for implementation of its strategies.

### 3.2 Designated Spokesperson

- Chairman of the Board;
- Managing Director;
- Senior Independent Non-Executive Director; or
- in their absence, the Executive Director.

### 3.3 Responsibility of Designated Spokesperson

- Proper dissemination of information and ensuring compliance with the disclosure obligations under the Listing Requirements.
- Communication, overseeing and co-ordinating disclosure of material information to all stakeholders and other audience constituents and respond to questions in relation to the corporate vision, strategies, developments, future prospects, financial results and plans, operation matters, etc in accordance with the Listing Requirements.
- Ensuring appropriate security measures are in place to maintain integrity of the information being disseminated.

### 3.4 Disclosure and Dissemination Channels

The Company is authorized to make use of a broad range of communication channels to disseminate information to its stakeholders and these include:

- Electronic facilities provided by Bursa Securities
- Press releases
- Corporate website
- E-mail
- Press conferences, road shows, exhibitions, industry events, investor conferences, analyst briefings, interviews or events
- General Meetings
- Oral statements made in group meetings and individual meetings with members of the investment community (which include analysts, investors, investment dealers, brokers, investment advisers and investment managers) or with employees.

## 4.0 STRATEGIES AND PROCEDURES

The Company has the following programmes and strategies in place to bridge and enhance the relationship with investors or potential investors:-

### 4.1 Announcement of Material Information

After the approval from the Board of Directors on releasing of material information, and subject to the disclosure obligations set out in the Listing Requirements, an announcement is made to the Bursa Securities. The investors in the contact list will be informed verbally or by email and/or a company press release will be issued to all major newspapers after the announcement. If necessary, meetings or presentations for investors and analysts will be conducted.

### 4.2 Annual General Meeting or Extraordinary General Meeting and Press Conference

The Annual General Meeting / Extraordinary General Meeting / Press Conference is held to communicate with the shareholders on the Company's performance, strategy, proposed corporate exercises, outlook, operational matters, etc.

### 4.3 Annual and Quarterly Financial Reports

The quarterly interim financial results are prepared in the format which is in compliance with the Listing Requirements and is published on the Bursa Securities on the same day after approval by the Board, which would thereafter be made available on the corporate website of the Company.

The Annual Report will be printed and distributed to shareholders and other interested groups by either softcopy or hardcopy.

### 4.4 Meetings or Interviews with Investors, Analysts and Media

The spokespersons will meet the shareholders, analysts or media to update them on the Company's performance, strategy, development, etc.

## 5.0 REPORTS AND RUMOURS

### 5.1 Analysts' reports

It is the Company's policy not to provide focused guidance to analysts in their efforts to develop their financial reports or earnings estimate of the Company. The Company will point

out factual errors or assumptions which are inconsistent with previously announced information. However, the Company will not review and comment on the analysts' reports, its conclusions or investments recommendations.

## 5.2 Rumours

It is the Company's policy not to respond or comment on market rumours and speculation, unless they appear to contain material information or misinformation, or where requested by Bursa Securities or any regulatory authorities, or may be reasonably expected to affect the price of the Company's securities or trading activity in those securities.

When a report or rumour about the Company contains material errors, the Company will issue an announcement to Bursa Securities and/or issue a press release to deny or clarify the matter and provide sufficient supporting information in accordance with the Listing Requirements.

## 6.0 **RESTRICTIONS PROHIBITIONS AND CONFIDENTIALITY**

Only the following persons who "need to know" are authorised to have access and become privy to sensitive and material information that has not been disclosed and made available to the public:

- members of the Board of Directors.
- the Chief Financial Officer and senior executives in the finance/accounts department designated by the Chief Financial Officer
- the Company Secretaries, Sponsors, auditors, reporting accountants, lawyers, and any other advisers on a "need to know basis" to enable such persons to carry out their roles and responsibilities at the appropriate time as may be determined by the Chief Financial Officer.

## 7.0 **PERIODIC REVIEW AND DISCLOSURE**

The Company shall review this Policy as and when is necessary and communicate the new changes to all relevant parties.

## 8.0 **CONTACT DETAILS**

Mr Pang Kim Hin

Tel : 03-8940 6638

Email : corporate@khj-my.com

Mr Hew Moh Yung

Tel : 03-8940 6638

Email : corporate@khj-my.com

*This Corporate Disclosure Policy has been approved and adopted by the Board on 31 December 2019.*