



**POLYMER LINK HOLDINGS BERHAD**

Registration No. 201301011960 (1041798-A)

(Incorporated in Malaysia under the Companies Act 1965  
and deemed registered under the Companies Act 2016)

**CORPORATE DISCLOSURE POLICY**

Corporate Disclosure Policy			
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## 1.0 INTRODUCTION

- 1.1 Polymer Link Holdings Berhad ("**Polymer Holdings**" or "**the Company**") is committed to provide its shareholders, stakeholders, investors, and the public in general with comprehensive, accurate and quality information on timely basis to enable them in making informed investment decisions. The purpose of this Corporate Disclosure ("**CD**") Policy is to develop and maintain an established framework for making disclosure of corporate information on the Company.
- 1.2 The key objectives of the CD Policy are as follows:-
- (a) to raise awareness and provide guidance to the Board of Directors ("**Board**"), management, officers and employees on the Company's disclosure requirements and procedures/practices;
  - (b) to provide guidance and policies in disseminating corporate information to, and in dealing with shareholders, stakeholders, analysts, media, regulators and the investing public;
  - (c) to ensure compliance with all applicable legal and regulatory requirements on disclosure of material corporate information; and
  - (d) to build good investor relations with the investing public that inspires trust and confidence.

## 2.0 SCOPE OF APPLICATION

This Policy applies to all directors, officers, and employees where applicable, of the Company and its subsidiaries (the "**Group**"). This Policy covers, but is not limited to the followings:-

- (a) Disclosure documents to be released on the website of Bursa Malaysia Securities Berhad ("**Bursa Securities**"), including the Company's annual and quarterly reports;
- (b) Financial and non-financial disclosures;
- (c) Press releases;
- (d) Letters to shareholders;
- (e) Information contained on the Company's website and other electronic communications;
- (f) Interviews with the media;
- (g) News conferences; and
- (h) Any other dealings with the general public.

### 3.0 DISCLOSURE AUTHORISATION

The authority for announcements to Bursa Securities is vested in the Board. The Board, assisted by key senior management and the Company Secretary, shall be responsible for the following:-

- (a) determining whether information constitutes material information within the ambit of the ACE Market Listing Requirements of Bursa Securities (“**Listing Requirements**”);
- (b) ensuring timely disclosure of material information in accordance with applicable laws and regulations, in particular, the Listing Requirements and stipulations of the Securities Commission Malaysia;
- (c) approving the contents to be provided to the media, investment community and other external parties, including the contents to be published in the Investor Relations section of the Company’s corporate website;
- (d) responding to rumours or reports, and unusual market activity as provided under the Listing Requirements; and
- (e) monitoring adherence to the CD Policy, reviewing, assessing and implementing appropriate remedial actions in relation to any violation of the CD Policy.

### 4.0 AUTHORISED SPOKESPERSONS

4.1 The Authorised Spokespersons for the Group shall be the Executive Director(s) or their designate.

4.2 The Authorised Spokespersons:-

- (a) may provide clarification on information which the Company has released to Bursa Securities but must not comment on any material information which has not been released to Bursa Securities; and
- (b) may attend to all enquiries from the media, investment community or other external parties, subject to compliance with the procedures prescribed under ‘Disclosure Process’ below and the Listing Requirements.

4.3 The Authorised Spokespersons shall exercise care to ensure comments which may spur speculation or rumours are not made.

### 5.0 DISCLOSURE PROCESS

The Disclosure Process in announcing material information to Bursa Securities is as follows:

- (a) Announcement to Bursa Securities to be made either on the same day, after market closure, or during the permissible window period. Should the information be released during trading hours, the Company may request for the temporary suspension of the trading of its shares.

- (b) Press release to all major newspapers and media services in Malaysia, except in cases of announcements to Bursa Securities for administrative situations.
- (c) The Board shall grant their approval to the Authorised Spokespersons to release the material information in accordance with the procedures of CD Policy and Related Party Transaction Policy.
- (d) The Company may hold investor, analyst, or media briefing or presentation on the announcement of the Company's financial results and any major corporate development. Any disclosure of such material information must be made by an announcement first to the Bursa Securities or simultaneously to the Bursa Securities, the press and newswire services. For the avoidance of doubt, the Company must not release such material information to the media even on an embargoed basis until it has given the information to the Bursa Securities. Any such presentation, briefing, or press release will be made available on the Company's website after the announcement first to the Bursa Securities.

## **6.0 MATERIAL INFORMATION AND IMMEDIATE DISCLOSURES**

### **6.1 Material information**

Material information, constitutes information which is reasonably expected to have a material effect on the following:-

- (a) the price, value or market activity of any of the Company's securities; or
- (b) the decision of a holder of securities of the Company or an investor in determining his/her choice of action.

Material information comprises any or a combination of the following:

- (a) Information concerning the Group's assets and liabilities, business, financial condition or prospects;
- (b) Information relating to dealings with 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.

### **6.2 Immediate disclosure of material information**

The Board, with the assistance of the Executive Director(s) and Company Secretary, shall exercise judgment in determining whether the information in question is material and requires immediate disclosure. Reference shall be to examples of events which require immediate disclosure in line with Rules 9.19 and 9.04 of the Listing Requirements.

### 6.3 Withholding of material information

The Company may temporarily refrain from disclosing material information only in exceptional circumstances provided by Rule 9.05(3) of the Listing Requirements and provided that confidentiality is maintained. In case where material information is being temporarily withheld, the Company must ensure that strict confidentiality of such material information is maintained.

## 7.0 PUBLIC DISSEMINATION

The Company undertakes to disclose material information in a manner which optimises the extent of dissemination to the public. No disclosure of material information shall be made on an individual or selective basis to the media, investment community or any other external party, unless such information has previously been fully disclosed and disseminated to the public.

- (a) If material information is inadvertently disclosed at any meetings with analysts, shareholders, journalists or others, it must be publicly disseminated as promptly as possible.
- (b) any public disclosure of material information must be made by an announcement first to the Exchange or simultaneously to the Exchange, the press and newswire services.

## 8.0 CLARIFICATION, CONFIRMATION OR DENIAL OF RUMOURS OR REPORTS

- 8.1 In the case where a rumour or report which has been circulated contain erroneous material information which the Company is aware of, the Company shall immediately announce to Bursa Securities a denial or clarification of the rumour or report. At the same time, the Company shall provide facts sufficient to support the denial or clarification of any misleading aspects of the rumour or report. The Company will also take reasonable effort to bring the announcement to the attention of the party that initially distributed the erroneous rumor or report.
- 8.2 In the case where a rumour or report contains material information that is correct, the Company shall prepare an announcement for public release, setting forth the facts and including, but not limited to, an indication of the state of negotiation or of corporate plans in the rumoured area.
- 8.3 Under normal circumstances, the Company shall not respond to any rumour or report predicting future sales, earnings or other quantitative data. However, if such rumour or report is manifestly based on, or contain, erroneous information, or is wrongly attributed to the Company which the Company is aware of, the Company shall respond promptly to the supposedly factual elements of the rumour or report as required above. The Board is entrusted with this responsibility, assisted by the Executive Director(s) and the Company Secretary.

## **9.0 RESPONSE TO UNUSUAL MARKET ACTIVITY**

- 9.1 Where unusual price movement, trading activity, or both (“unusual market activity”) occurs, the Company shall immediately undertake due enquiry to seek the cause of unusual market activity in its securities, regardless of the issuance of unusual market activity query by Bursa Securities. The Company shall consider, in particular, the nature of any information concerning the Group which may have accounted for the unusual market activity that:-
- (a) has recently been publicly disclosed;
  - (b) has not been publicly disclosed, in which case the unusual market activity may signify a leak of information; or
  - (c) is the subject matter of a rumour or a report.
- 9.2 Generally, if the Company determines that the unusual market activity results from material information that has already been disclosed, no further announcement or response is required. If the unusual market activity results from a leak of previously undisclosed information, the Company shall disclose the information in question in accordance with the Listing Requirements. If the unusual market activity results from a rumour or report, the Company shall respond in accordance with the Listing Requirements and this CD Policy.
- 9.3 If the Company is unable to determine the cause of the unusual market activity, the Company shall announce to Bursa Securities that there have been no undisclosed developments which accounted for the unusual market activity.

## **10.0 INSIDER TRADING**

- 10.1 The Company and parties who may be regarded as insiders must be fully aware of the provisions of the Capital Markets and Services Act, 2007 and the Companies Act 2016.
- 10.2 A person is an “insider” if that person:-
- (a) possesses information that is not generally available which, on becoming generally available, a reasonable person would expect it to have a material effect on the price or the value of securities; and
  - (b) knows or ought reasonably to know that the information is not generally available.
- 10.3 Insiders shall not trade on the basis of material information which is not known to the investing public. Insiders shall not tip off or inform another person of such material information, irrespective of whether such person intends to trade on such information.
- 10.4 Closed Period

“Closed Period” is defined as a period commencing thirty (30) calendar days before the targeted date of announcement up to the date of the announcement of the Company’s quarterly results to Bursa Securities.

During Closed Periods, the Authorised Spokespersons are prohibited from commenting on the current period earnings and financial assumptions. Communications shall be limited to commenting on publicly available or non-material information.



## **11.0 FORWARD-LOOKING INFORMATION**

- 11.1 The Company may provide forward-looking information to convey its future direction to the public, in order to enable reasoned market valuation of the Company's securities, provided that such forward-looking information does not constitute undisclosed material information/future earnings and has been reviewed and/or approved by the Board. Such information may include prospects, revenue, profits estimates, forecasts, projections or internal targets or key performance indicators which are based on historical and publicly disclosed data.
- 11.2 All documents containing forward-looking information shall be accompanied by a disclaimer cautioning investors of the risks and uncertainties which may cause actual results and developments to differ materially from those envisaged in the forward-looking information. When making oral representation on forward-looking information, the Authorised Spokespersons shall take reasonable care and include such disclaimer to the same effect.

## **12.0 DEALINGS WITH THE MEDIA, INVESTMENT COMMUNITY AND OTHER EXTERNAL PARTIES**

- 12.1 Only the Authorised Spokespersons are permitted to participate at briefing sessions, meet with, initiate contacts with, or respond to calls from, the media, investment community or other external parties, including other market professionals on behalf of the Company.
- 12.2 In communications with the media, investment community and other external parties, the Company's Authorised Spokespersons shall only provide factual and non-speculative information which has been reviewed and/ or approved by the Board.
- 12.3 When the answering of unexpected questions involves, or may involve, the disclosure of previously undisclosed material information during communication sessions with the media, investment community and any other external parties, the Authorised Spokespersons shall decline to respond to the questions and, if appropriate, take the questions on notice for further action as determined by the Board. The Authorised Spokespersons shall refrain from any form of promotional disclosure activity which may misled investors or cause unwarranted price movement and activity. Such activity includes news releases, public announcements, predictions, reports or advertisements which are not justified by actual developments concerning the Company, exaggerated, flamboyant, overstated or over-zealous.

## **13.0 PROCEDURES FOR DISCLOSURE OF MATERIAL INFORMATION**

- 13.1 The Board shall manage all the Company's releases of announcement of material information to Bursa Securities through the Company Secretary and/or the Recognised Principal Adviser (if any).
- 13.2 All announcements shall be approved by the Board before they are released to Bursa Securities by the Company Secretary.

#### **14.0 REVIEW OF CD POLICY**

The Board shall review and assess the relevance and effectiveness of this CD Policy from time to time or when changes to regulatory requirements necessitate a revision. Changes, if any, to the document shall be approved by the Board in writing.

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