



EP MANUFACTURING BHD

Registration No. 199601017765 (390116-T)
(Incorporated in Malaysia)

CORPORATE DISCLOSURE POLICY

1. INTRODUCTION

EP Manufacturing Bhd (“the Company” or “EPMB”) and its subsidiaries (“the Group”) are committed to provide accurate, timely and complete disclosure of material information to shareholders, stakeholders and the public generally to enable informed and orderly market decision by investors.

In formulating this policy, the Company has made reference to the recommendations contained in the Corporate Disclosure Guide issued by Bursa Malaysia Securities Berhad (“Bursa Securities”) and its disclosure obligations contained in the Main Market Listing Requirements (“MMLR”) of Bursa Securities.

2. RATIONALE AND OBJECTIVE

- i) This Policy sets out the internal procedural guidelines for achieving consistent disclosure practices across the Group. It outlines the Company’s approach towards maintaining confidentiality of information, restriction on insider trading, preventing abuse of undisclosed material information, monitoring and responding to market rumors, leaks and inadvertent disclosure.
- ii) This policy aims to reinforce EPMB’s commitment to comply with all applicable legal and regulatory requirements on disclosure of material information.

3. SCOPE AND APPLICATION

- i) This Policy applies to all Directors, officers, employees, auditors, investment banker and advisors of the Company and its subsidiaries and those authorised to speak on their behalf.
- ii) This Policy does not apply to communication made in the ordinary course of business of the Company and its subsidiaries not involving material information.

4. ADMINISTRATION OF CORPORATE DISCLOSURE

The Board is ultimately responsible for ensuring effective implementation of this policy and the disclosure requirements as set out are fulfilled. The Board delegates the implementation of this policy to the Executive Committee (“EXCO”).

The EXCO will be responsible for the following:

- To oversee the Group's disclosure procedures and controls and ensure adherence to the Policy.
- Ascertain if any corporate developments, transactions and other events constitute material information and if so, ensuring the procedures outlined in the Policy are fully adhered to.
- Timely disclosure of material information in accordance with applicable laws and MMLR of Bursa Securities.
- To response to any query raised by Bursa Securities.
- Regularly review and update the Policy to ensure compliance to the MMLR and other regulatory requirements.

Authorised Spokeperson

- a. The list of the Authorised Spokepersons is as follows:

Primary Spokeperson: Group Chief Executive Officer

Secondary Spokeperson: Head of Corporate Communications

Note:

- 1. Primary Spokeperson will be responsible to communicate with public and respond to questions in regards to the corporate vision, strategies, developments, future prospects, financial plans and operation matters.*
 - 2. There could be blanket delegation on routine matters, in absence of any Authorised Spokeperson(s) for matters which delegation is possible.*
 - 3. The Secondary Spokeperson is only authorised to communicate or response with outsider with prior consent or being authorised by the Primary Spokeperson.*
- b. Authorised spokespersons in respond to the specific enquiries from the Public, shall not disclose material information that has not been previously made public.
- c. Employees other than the Authorised Spokepersons shall not respond to inquiries from investment community or media unless authorised to do so by referring to the authorised spokesperson.
- d. If there is any ambiguity about the appropriateness of supplying information to an outsider, the authorised spokesperson should be contacted for advice.

5. MAINTAINING CONFIDENTIALITY

Pursuant to the MMLR of Bursa Securities, material information is generally considered to be any information relating to the business, operations and financial performance of the Company that results in, or would reasonably be expected to have a material effect on:

- i) the market price, value or market activity of the Company's securities; or
- ii) the decision of a holder of securities of the Company or an investor in determining his choice of action

Materiality can be subjective and the Company will take the approach of assessing the likely effect of the information on the activities and financial position of the Company, or the price and performance of the Company's securities, in addition to whether the circumstances or events are measurable and would trigger the relevant thresholds in the percentage ratio calculations set out in the MMLR of Bursa Securities.

Information which may have a material effect on the above may include information which:

- (a) concerns the listed issuer's assets and liabilities, business, financial condition or prospects;
- (b) relates to dealings with employees, suppliers, customers and others;
- (c) relates to any event affecting the present or potential dilution of the rights or interests of the listed issuer's securities; or
- (d) relates to any event materially affecting the size of the public holding of its securities.

Employee who is privy to confidential corporate information is prohibited from communicating such information to anyone else, unless required in the course of business or required by law or authorised by the EXCO. Efforts will be made to limit access to such confidential information to only those who "need to know".

Management shall ensure that outside parties who is privy to undisclosed material information confirm their commitment to non-disclosure through a written confidentiality agreement.

6. DISCLOSURE PROCEDURES AND CONTROLS

6.1 Disclosure Procedures

- i) It is essential that the EXCO and Authorised Spokeperson be fully informed of all Company's developments that could potentially impact the disclosure process.
- ii) It is the responsibility of the corporate and business unit departments to keep the EXCO and the Spokepersons fully apprised of all significant developments in the Company so as to :
 - a. facilitate determination of materiality, appropriateness and timing for public disclosure of the information, or whether the information should remain confidential;
 - b. ensure appropriate understandings of significant developments and updates which may be relevant to ongoing communications with the investing public; and
 - c. avoid denying significant developments when in fact, such developments are occurring.
- iii) The EXCO will manage all the Company's releases of announcements of material information to Bursa Securities through the Company Secretary or the appointed merchant bank in accordance with the applicable securities law and MMLR and the announcement shall then be approved by the Board/Board Chairman/Group Chief Executive Officer or their designate before release to Bursa Securities.
- iv) For news/ media releases through the Corporate Communications Department, the EXCO has the overall responsibility to ensure that the contents are clearly and effectively communicated to the intended substance and meaning of the information to the public.
- v) To ensure widest possible public dissemination, once the announcements or media releases been made, it must also be posted and make available on the Company's website.

- vi) Upon dissemination of announcement and media releases, the Corporate Communication departments are to ensure accurate media reporting and will take any corrective measures, if necessary.

6.2 Disclosure Principles

The Company shall adhere to the following basic disclosure principles:

- i) Timeliness disclosure
- ii) Consistent approach to materiality
- iii) Material information to be temporarily kept confidential if detrimental to the interest of the Company
- iv) Factual and non-speculative disclosure
- v) Prompt disclosure of unfavourable material information
- vi) Inadvertent disclosures to be disclosed immediately via announcements
- vii) Immediate correction of material error in disclosure
- viii) Thorough Public Dissemination and avoid selective disclosure
- ix) Immediate respond to clarify, confirm or deny rumours or reports which had caused significant reaction in the market for the Company's listed securities.

6.3 Insider Trading

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

i) Dealing Restrictions

Anyone who possesses material insider information is prohibited from trading in the Company's securities until after the information has been publicly disclosed. It is also illegal for anyone to inform or tip any other person of material non-public information. Questions as to whether information is material, potentially material or whether such information has previously been disclosed in accordance with this Disclosure Policy should be directed to the EXCO or Company Secretary.

ii) Closed Period

The Company adopts the Closed Period as defined in the MMLR of Bursa Securities, as a period commencing 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.

All Authorised Spokespersons are prohibited from commenting on current period earnings, estimates and financial assumptions; and must also avoid initiating meetings with investment analysts, security holders, potential investors and the media on items significant to investors, other than responding to unsolicited inquiries concerning factual information.

Having stated the above, the Company does not stop all communications with analysts or investors during this period and may, for example, participate in investment meetings and conferences organised by other parties, as long as material information which has not been publicly disclosed, is not selectively disclosed.

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 MMLR.

7. REVIEW OF THIS POLICY

This Policy shall be kept under review, updated and be revised as and when required in accordance with the needs of the Company, development of corporate governance practices, and/or any other applicable laws enforced at the time being. Any changes to the terms of the Policy shall be subject to the approval of the Board.

APPROVED BY THE BOARD ON 25 AUGUST 2023