

SAM ENGINEERING & EQUIPMENT (M) BERHAD

(Company No.298188A)

Appendix G

CORPORATE DISCLOSURE POLICIES AND PROCEDURES

1. Introduction

In formulating this policy, the Company has taken into account the recommendations contained in the Malaysian Code on Corporate Governance 2017 and the disclosure obligations contained in the Listing Requirements. This policy applies to the Company's Board of Directors and all its staff.

The objective of this policy is to provide guidance, *inter alia*, on (i) the dissemination of information by the Company to; and (ii) communication with, the targeted audience of the Company.

2. Material Information

Material information is any information about the Company which may reasonably be expected to have a material effect on:

- The market price or value of the Company's securities, or activity in the trading of its securities; or
- A decision to buy, sell or continue holding the Company's securities which is made by an existing holder of those securities, or someone considering an investment in those securities

Material information is described in detail in the Listing Requirements and may be contained in either written or oral communications. The following are a few examples of documents or communications that would most likely contain Material Information:

- Reports, responses and documents provided to the Exchange and other regulators;
- Meeting materials and statements in the Company's Annual Reports, quarterly reports, press releases and circulars to shareholders;
- Presentations on behalf of the Company.

Materiality can sometimes be very subjective. In such circumstances, the Company will in its best endeavors attempt to assess materiality on a case to case basis either through evaluation the likely consequences of the information against the price, financial position and performance of the Company's securities or vide the percentage ratio calculation method as set out in the Listing Requirements.

3. Target Audience

The Company recognize the following audience to which information, which may or may not be material in nature, may be disseminated towards:

- Shareholders, stakeholders and prospective investors;
- Analysts, fund managers and investment bankers;
- The financial press and other media.

4. Communications Commitment

The Company, to the best of its endeavor, will adopt the following characteristics in its communications:

- **Transparent:** material information will be released, whether it is favorable or not, in a balanced and fair manner that is not misleading.
- **Consistent:** all stakeholders will receive the same information; only formats may differ depending on audience and forum.
- **Accurate:** information should be complete and accurate when released and any material errors or omissions will be immediately corrected and clarified.
- **Non-selective:** equality of access to material information will be achieved through broad public dissemination; no stakeholder will be given undisclosed material information in any form.
- **Timely:** material information will be released as soon as it is known, unless there are exceptional, legitimate reasons to withhold, in which case material information will not be withheld longer than absolutely necessary and the strictest confidentiality must be maintained until the material information is released.

5. Authority to Communicate & Responsibility

Other than the authorized persons in this Section, no other individuals may act as spokesperson(s) for the Company.

- **Primary Spokesperson**

Communicate with all audience constituents, providing information, data and analysis and responding to questions concerning all aspects of the Company's operations and financial condition, its future prospects and its strategies.

- **CEO** – Day-to-day management and financial responsibility, responsible for all financial results and plans, the corporate vision, strategies, development, future prospects, decides/recommends on materiality and disclosure, approves announcements (except for release of material information which must comply with Section 6 below).

- **Secondary Spokesperson**

Communicate with audience constituents in connection with their specific areas of responsibility within the Company, unless they are specifically authorised to undertake broader communications by a Primary Spokesperson or the Board of Directors.

- **CFO** – Responsible for financial controls, accounts, financial reports and plans, legal affairs, review announcements and press releases.
- **COO** – Responsible for all operation matters, crisis communications and management, business continuity and disaster recovery.
- **Any other person designated by CEO**

6. Release of Material Information

The Company will, to the best of its endeavors adopt, the following approach in its release of material information:

Step 1: Obtain approval from the Board of Directors pertaining to the release of material information.

Step 2: An announcement or response is made to the Exchange.

Step 3: Issue of Company press release to all major newspapers in Malaysia, if required.

(Note: Not all information announced to the Exchange will be followed by a press release, unless necessary).

Step 4: A press conference or briefing/presentation for investors, analysts and the media may be convened, if required.

(Note: This will usually take place following the announcement of any major corporate development, if any).

Step 5: The Company's press release, and any presentation material produced for a press conference or briefing, are posted on the Company's website.

7. Confidential Information & Leaks

All information regarding the Company, its operations, financial condition and future prospects, should be regarded as material and price-sensitive, and must be treated as confidential unless it is already in the public domain.

To protect the confidentiality of information, access to information should be restricted only to those persons (employees, or third parties) who have a legitimate need for the information consistent with their duties or obligations to the Company.

Third Parties: In certain circumstances, the Company may provide material information which is not in the public domain to third parties. For example, the Company's auditors, company secretary, bankers, lawyers or other professional advisors may require such information to properly execute their duties. Unless there are adequate existing legal protections which are to the satisfaction of the Company, the Company will require the execution of non-disclosure and confidentiality agreements by these persons.

Leakage & Accidental Disclosure: In the event of an information leakage, or the accidental disclosure of unpublished material information, the situation will be addressed in line with the Company's chain of authority and responsibility. If deemed necessary, the Company will make an appropriate announcement to the Exchange as soon as practicably possible, which may be followed by a press release and/or other communication modes.

8. Financial Reports & The Annual General Meeting

- Quarterly Reports of interim financial results will be issued to the Exchange on the day of approval by the Board of Directors and uploaded on the Company's website via electronic facilities provided by Bursa Malaysia Securities Berhad (Bursalink).
- The Annual Report is managed within the Company as a special project, with Investor Relations acting as coordinators. The CFO and Finance Department are responsible for the financial statements, notes and related information. The management team and Company Secretary are responsible for copy, content and compliance. The appointed printer is responsible for design, layout, production and dispatch.
- The Annual General Meeting is held to facilitate dialogue between the Company and its shareholders with regard to the Company's performance, strategy, proposed corporate exercises, outlook and operational matters, etc. Notice for the meeting will be announced on the Exchange and in one of the national edition newspapers. In line with the commitment to equality of access to information, summarised minutes and presentation materials from the Annual General Meeting will be posted on the Company's website.

9. Press Conferences, Briefings & Meetings

Press Conferences and Briefings are normally held when there is an announcement of major corporate developments. Primary Spokespersons will conduct the press conference/briefing, with assistance from Secondary Spokespersons where necessary. The presentation materials from the meetings will be posted on the Company's website.

Meetings/Interviews with Investors, Analysts and the Media take place as part of the Company's on-going external communications and Investor Relations programs. These meetings may be arranged on either an individual basis or in groups. The Company will endeavor to meet with all shareholders at least once in each fiscal year to provide an update of Company performance and developments.

The Primary Spokesperson will conduct the meetings with Investor Relations in attendance. The presentation materials prepared for these meetings will be posted on the Company's website.

10. Reports & Rumours

Analysts' reports: The Company will only point out factual errors or assumptions which are inconsistent with previously announced information. The Company will not endorse any analyst's report or influence the opinions or conclusions of the analyst.

The Company may also circulate the analysts' report to its Board of Directors and senior management to assist them in understanding how the market and outsiders view the Company.

Rumours: The Company will not respond to reports or rumours about the Company, unless they appear to contain material information, or may be expected to affect the price of the Company's securities or trading activity in those securities.

When a report or rumour about the Company that contain erroneous material information is discovered, the Company will make the necessary due enquiry and immediately issue an announcement to the Exchange to deny or clarify the report or rumour with supporting facts relevant to the denial or clarification, if available.

11. Principal Officers and Insiders

Anyone who has access to material information of the Company, its financial condition and its operations which is not generally available, is regarded as an Insider. The Company recognises its principal officers as Insiders.

Material information which is in the possession of an Insider and has not been disclosed to the Exchange and the investing public is Inside Information (including each of the Board of Directors' and Board Committees' meeting materials).

Insiders may not to deal in the Company's securities while in possession of Inside Information, and shall not pass that information to aid another person deal in the Company's securities.

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

The list of all Insiders will be reviewed by the Management from time to time when deemed necessary.

12. Obtaining Feedback & Company Website

The Company has developed various channels for shareholders and major stakeholders to provide their comments and feedback via the Company website (www.sam-malaysia.com) and or via email to investorrelations@sam-malaysia.com. The website will provide for email communication with the Company, and for stakeholders to register their interest in information about the Company.

The Marketing department is generally responsible for the content, presentation and the prompt updating of all sections (other than the section on Investor Relations) of the Company website, whereas, Investor Relations is responsible for the content of the Investor Relations sections of the website.

Presentation materials for briefings or meetings with investors, analysts and the media will be posted on the website.

13. Publication of Policy

This Policy was adopted by the Board of Directors on 16 August 2017 and published (as updated and approved by the Board of Directors from time to time) on the Company's Website in the Investor Relations section.

14. Contact Details

SAM Engineering & Equipment (M) Berhad

Tel: +604 643 6789

Investor Relations

Tel: +604 – 614 7600