



AWANBIRU TECHNOLOGY BERHAD

[Reg. No. 201001038336 (92260-K)]
(Incorporated in Malaysia)

CORPORATE DISCLOSURE POLICY AND PROCEDURES

Adopted as at 5 July 2021

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1. PURPOSE

This Policy outlines the AwanBiru Technology Berhad ("**Awantec**" or the "**Company**") approach towards providing accurate, clear, timely and complete disclosure of material information pertaining to the Company's performance and operations to shareholders, investors and the public general in compliance with applicable legal and regulatory requirements.

In formulating this Policy, the Company has taken into account the recommendations of the Malaysian Code on Corporate Governance ("**MCCG**") and its disclosure obligations contained in the Main Market Listing Requirements ("**Listing Requirements**") of Bursa Malaysia Securities Berhad ("**Bursa Securities**").

2. SCOPE OF APPLICATION

The Policy applies to the conduct of all directors, officers and employees of the Company and its subsidiaries ("**the Group**") and those authorised to speak on their behalf. This Policy covers, but is not limited to the following: -

- a. Documents filed with, and announcements made to, Bursa Securities, Securities Commission ("**SC**") and other regulators or authorities, the Company's annual report, financial statements, quarterly reports, press releases, letters to stakeholders, circulars to shareholders, electronic mail communication and information contained in the Company's corporate website and digital platforms;
- b. Oral statements made at group and individual meetings, telephone conversations, interviews and press conferences with members of the investment community (including but not limited to analysts, investors, investment dealers, brokers, investment advisers and investment managers) or with employees; and
- c. Any other dealings with the general public.

This Policy does not apply to communications made in the ordinary course of business of the Company and its subsidiaries not involving material information.

3. MATERIAL INFORMATION AND IMMEDIATE DISCLOSURES

3.1 Immediate disclosure of material information

Material information constitutes information about the Company and its subsidiaries which are reasonably expected to have a material effect on the following: -

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

The Board with the assistance of the Executive Directors and/or Management of the Company and/or the Company Secretary, shall exercise judgment determining whether the likely effect of the information is deemed to be material.

The Board shall be guided by **Paragraphs 9.19 and 9.04** of Bursa Securities' Listing Requirements (as amended from time to time) in respect of events requiring immediate disclosure to Bursa Securities.

Subject to the terms of this Policy, material information will be announced immediately to Bursa Securities and such announcements are made available on the Company's website.

3.2 Withholding of material information

The Company may temporarily refrain from disclosing material information only in exceptional circumstances provided by **Paragraph 9.05(3)** of Bursa Securities' Listing Requirements and provided that confidentiality is maintained.

3.3 Maintaining confidentiality

In case where material information is being temporarily withheld, the Company must ensure that strict confidentiality of such material information is maintained.

Any employee privy to confidential corporate information is prohibited from communicating such information to anyone else, unless it is necessary to do so in the course of business or required by law or authorised by the Board.

However, in the event of leakage of material information, the Company will take appropriate action to make an immediate announcement to Bursa Securities.

4. PROCEDURES FOR DISCLOSURE OF MATERIAL INFORMATION

The Board shall manage all the Company's releases of announcement of material information to Bursa Securities through the Company Secretary or designated person authorised by the Board. All announcements shall be approved by the Board before they are released to Bursa Securities.

5. PUBLIC DISSEMINATION

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

6. CLARIFICATION, CONFIRMATION OR DENIAL OF RUMOURS OR REPORTS

Generally, the Company should not entertain market rumours unless there is significant reaction in the market for the Company's listed securities or the Company is of the view that a corresponding response to such rumours would be beneficial to the Company. The Board shall have the discretion to consider whether the Company should respond to such market rumours.

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 by providing facts sufficient to support the denial or clarification of any misleading aspects of the rumour or report.

7. RESPONSE TO UNUSUAL MARKET ACTIVITY

Where unusual price movement, trading activity, or both ("**unusual market activity**") occurs, the Company shall immediately undertake due enquiry regardless of whether an unusual market activity query is issued by Bursa Securities. Thereafter, a clarifying announcement shall be issued on an immediate basis.

8. INSIDER TRADING

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.

Based on Section 188(1) of the Capital Market & Services Act 2007, an “insider” is a person who: -

- 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.

Insiders are prohibited from trading on the basis of material information which is not known to the investing public until after the information has been publicly disclosed. Insiders shall not tip off or inform another person of such material information, irrespective of whether such person intends to trade on such information.

9. DEALINGS WITH THE MEDIA, INVESTMENT COMMUNITY AND OTHER EXTERNAL PARTIES

Unless otherwise authorized by the Company, only the following individuals ("**Authorised Spokespersons**") are authorized to make public oral statements or initiate contacts with analysts, the media and investors on behalf of the Company. The Company's Authorised Spokesperson shall only provide factual and non-speculative information which has been reviewed and/or approved by the Board.

The list may be changed by the Company from time to time.

Spokesperson	Area
Chief Executive Officer	All Areas
Chief Operating Officer	All Areas
Chief Financial Officer	All Areas

10. REVIEW OF THE POLICY

This Policy shall be reviewed periodically by the Board in accordance with the needs of the Company, from time to time or when changes to regulatory requirements necessitate a revision, but at least once every three (3) years; any recommendation for its revision will be highlighted to the Board for approval.

<p>Adopted by the Board on: 5 July 2021</p>
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