

## Corporate Disclosure Policy

### 1. Introduction

PCCS Group Berhad (“PCCS” or “the Company”) is committed to providing corporate information that will be helpful to the shareholders and investors in making investment decisions. The purpose of this policy is to develop and maintain an established framework for making corporate disclosure.

### 2. Objectives

- 2.1. To raise awareness and provide guidance to the Board of Directors’ (“Board”), Management, officers and employees on the Company’s disclosure requirements and practices;
- 2.2. To provide guidance and policies in disseminating corporate information to, and in dealing with shareholders, stakeholders, analyst, media, regulators and the investing public;
- 2.3. To effectively increase understanding of the Company’s business and enhance its corporate image by encouraging practices that reflect openness, accessibility and co-operation;
- 2.4. To reinforce PCCS’s commitment to compliance with the continuance disclosure obligations imposed by Malaysian securities law and regulations and the Main Market Listing Requirements (“Main LR”) of Bursa Malaysia Securities Berhad (“Bursa Securities”); and
- 2.5. To build good investor relations with the investing public that inspires trust and confidence.

### 3. Scope

This policy should cover the disclosure requirements as stated in the Main LR of Bursa Securities and material information defined below that relates to the Company and its subsidiaries (“the Group”).

The Directors of the Company, the Company Secretary, all employees of the Group shall observe the provision of this policy.

### 4. Exclusion

This policy does not cover: -

- (i) material information that is already in the public domain;
- (ii) material information that is not generated or owned by the Company;
- (iii) material information that summarises, realigns or is computed from material information that already in the public domain.

**PCCS GROUP BERHAD**  
Company No. 280929-K  
(Incorporated in Malaysia)

Example of which include information on financial ratios that, although never been disclosed directly before, could be derived from realigning figures in financial statements disclosed previously.

**5. Material Information**

“Material information” is information that is necessary for shareholders or potential investors of the Company to make informed decisions, and/or information that has a material effect on the share price of the Company.

**6. Policy**

The Company is committed to making regular and ad-hoc public disclosure of arising material information which relates to its operation, financial performance, prospects or as required by law or requirements. The Company will ensure that the information it publishes is:-

- (i) materially accurate and true;
- (ii) free from material omission;
- (iii) consistent and not selective;
- (iv) fairly accessible to all parties; and
- (v) in the best interest of the Company and its shareholders in general.

**7. Public Disclosure**

In general, the Company considers an announcement made through Bursa Securities’s announcement platform as the most appropriate avenue for public disclosure. Secondarily, a press release through national newspapers or agencies is viewed as acceptable public disclosure.

**8. Spokesman**

Only the Group Managing Director, the Executive Director or in their absence, the Group Finance and Account Manager are the authorised spokesman of the Company. Other persons may be a temporary spokesman of the Company if so authorised by the Board of Directors.

The spokesman shall ensure that no material information is released to selective parties.

Only the spokesman or other authorised person of the Company is allowed to address the public, approve announcement, make press release, clarify rumours and authorise the publication of contents on the Company’s website on behalf of the Company.

**9. Accuracy, Transparency and Depth of Information**

The Board is tasked to ensure that material information published by the Company will assist the shareholders and stakeholders in understanding the message it

intends to deliver. The published material information should be free of material misstatement/error/omission/ambiguity, and is easy to understand.

**10. Suspending Disclosure of Material Information**

The Company may withhold certain material information which, if released, would seriously undermine the interests of the Company or shareholders in general. The Company shall publish the material information as soon as practicable after the undermining effect on the interests of the Company or shareholders in general has subsided or has become common knowledge to the general public.

**11. Fair Accessibility to Material Information**

Material information from the Company shall be fairly accessible to the general public and the Company applies a non-discrimination policy to receivers of the material information. Selective disclosure is prohibited unless there is a special need and in the best interest of the Company or shareholders in general.

**12. Early Receivers of Material Information**

The Company will ensure that early receivers of material information, due to specific circumstances like appointed agent on making announcements or appointed professional adviser on specific technical or sensitive issues, will also observe the provisions of this policy.

**13. Internal Containment Measures**

The Company applies the strictest information containment measures to ensure that only approved key personnel will have access to the material information before it is disclosed to the general public.

**14. Press Release**

In general, undisclosed material information will not make debut disclosure through public media. In practice, certain important information like lengthy elaboration of a topic (e.g. the discussion on the industry prospects or the Company's strategy) may make debut release through national newspapers or agencies to ensure fair accessibility.

**15. Rumours**

In general, the Company will not respond to any rumour, unless the rumour brings undesirable impact to the interests of the Company or shareholders in general or it is required by a relevant authority.

**16. Corporate Website**

The Company's corporate website (<http://www.pccsgroup.net/>) will not make any debut disclosure of material information. Nonetheless, certain non-material information or summary, realignment or computation of material information that are already available to the public may be released through the Company's corporate website.

**17. Closed Period**

Closed Period means a period commencing *30 calendar days prior* to the targeted date of announcement to Bursa Securities of the quarterly results, up to the date of announcement of the quarterly results [pursuant to subparagraph 14.02(b) of the Main LR of Bursa Securities].

Unless extremely necessary or required by relevant laws/requirement/authority, the Company will not make public disclosure during closed period other than providing guidance for the result relates to that closed period (if so required).

Key personnel who may have access to undisclosed material information are prohibited from trading the Company's shares during closed period.

**Procedures in relation to the disclosures for dealings in securities during Closed Period**

Pursuant to Paragraph 14.05 of the Main LR, where an affected person engages in dealings with the Company during a closed period, the following procedures set out in Paragraph 14.08 of the Main LR are to be complied with:-

- (a) before the proposed dealing, the affected person must give notice of intention to deal in writing to the Company;
- (b) upon receipt of such notice, the Company would immediately announce to Bursa Securities, among others, the following information:-
  - (i) the affected person's current holdings of securities in the Company; and
  - (ii) the affected person's intention to deal in the securities of the Company during a closed period;
- (c) the proposed dealing can only be effected after one (1) full market day from the date of the announcement made pursuant to (a) above; and
- (d) the affected person must give notice of the dealing in writing to the Company Secretaries of the Company within one (1) full market day after the dealing has occurred and the Company must immediately announce such notice to Bursa Securities. The Company would include the following in the notice and announcement:-
  - (i) the date on which the dealing occurred;
  - (ii) the consideration for the dealing; and
  - (iii) the number of securities involved in the dealing, both in absolute terms and as a percentage of all issued securities of that class in the affected company.

**18. Prohibition of Insider-Trading**

The Company's staff are prohibited from trading in PCCS's shares at any time they are in possession of any undisclosed material information.

**19. Forward-looking Information**

The Group's policy is not to disclose any forward-looking information. However, where a disclosure of forward-looking information is necessary, the Company will ensure that appropriate disclaimers and sufficient caution is given to readers on the uncertainty of relying on forward-looking information.

**20. Review of Policy**

This policy will be reviewed biennially or as and when it is required to ensure the information remains current and updated.

**History of the Corporate Disclosure Policy**

Date	Description
27 May 2016	Establishment of Corporate Disclosure Policy