

## **Corporate Disclosure Policy and Procedures**

### **1. Objective**

This Corporate Disclosure Policy and Procedures set out the principles for the disclosure of material corporate information to all stakeholders in an accurate, clearly, timely and complete manner to avoid selective disclosure to the investing public.

### **2. Designated Spokesperson**

The Managing Director will serve as the primary spokesperson for the disclosure requirement and to communicate with audience constituents and responds to questions in relation to the corporate vision, strategies, developments, future prospects, financial plans and operation matters.

In the absence of any designated spokesperson, the authorised spokesperson may, from time to time, designate others within the Company to speak on behalf of the Company or to respond to specific inquiries. There could be blanket delegation on routine matters.

Employees other than the designated spokesperson shall not respond to any inquiries from the investment community or media. All such queries should be referred to the designated spokesperson.

### **3. Principles of Disclosure**

This Policy covers the following methods employed by the Company to communicate with the shareholders, stakeholders, analysts, media, regulators and the investing public:-

- a) documents filed with the regulators, written statements made in the Company's annual report, financial statements, quarterly reports, press releases, letters, circular to shareholders, e-mail communication and information on the Company's website; and
- b) oral statements made in group and individual meetings, telephone conversations, interviews and press conferences including video conferencing with financial analysts, investors and media.

The Company has adopted the following principles and procedures to enhance the relationship with investors or potential investors:

#### 3.1 Immediate disclosure of Material Information

Any material information that is reasonably expected to have a material effect on the share price value or market activity of the shares or the investors' decision-making will be announced immediately to Bursa Malaysia and made available in the Company's website.

#### 3.2 Withholding of Material Information and maintaining confidentiality

Material information may be kept confidential temporarily if the immediate disclosure would prejudice the ability of the Company to pursue its corporate objectives. In such cases, the Company must ensure that the material information will be kept confidential to prevent from leakage. The Company should limit the number of people with access to or in possession of the material information and ensure that all confidential documents are being protected and secured.

### 3.3 Rumours

If the Company is aware of any rumours or reports, true or false, that contains material information, the Company will make due enquiry and immediately publicly clarify, confirm or deny the rumours or reports. In the event that the rumour or report containing erroneous material information which has been circulated, the Company will immediately announce to Bursa Malaysia and provide facts sufficient to support the denial or to clarify any misleading aspects of the rumour or report. In the event that rumour or report containing material information that is correct, an announcement setting forth the facts must be prepared for public release, which must include but not be limited to, an indication of the state of negotiations or of corporate plans in the rumoured area.

Material information means any information about the Company and its subsidiaries which are reasonably expected to have a material effect on:

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

All announcements have to be approved by the Board before releasing to Bursa Malaysia. From time to time, the Company Secretary will advise the Board and principal officers on the trading restrictions in the Company's securities in accordance with the provisions of the Ace Market Listing Requirement of Bursa Malaysia.

#### **4. Use of Information Technology**

The company will take advantage of the current information technology to disseminate information to the investing public.

The Company's website ([www.managepay.com](http://www.managepay.com)) provides an avenue for the shareholders and the investing public to access information pertaining to the Company. It contains an "Investor Relations" section.

#### **5. Consequences for Non-Compliance with this Policy**

An employee who violates this Policy may face disciplinary action, which may result in the termination of employment. The violation of this Policy may also violate certain securities laws.

If the Company discovers that an employee has violated such securities laws, it may refer the matter to the appropriate regulatory authorities, which could lead to penalties, fines or imprisonment.

#### **6. Review of Policy**

This Policy shall be reviewed by the Board as and when necessary and may be amended as the Board may deem appropriate.

The Company shall disclose this Policy in its corporate website.