

MANFORCE GROUP BERHAD
(Registration No.: 201701014455 (1228620-V))
(Incorporated in Malaysia)

Corporate Disclosure Policy

This policy stipulates the basic principles and procedures of corporate disclosure adopted by MANFORCE GROUP BERHAD ("the Company") in order to communicate and disseminate Material Information impartially to stakeholders on timely, accurate, clear and complete manner, in accordance with LEAP Market Listing Requirement ("LMLR") and other applicable laws and regulations.

This policy forms a part of the Company internal rules and regulations and applies to all directors, officers and employees of the Company and its subsidiaries ("the Group") and at the same time clearly expresses its commitment on transparent, quality and timely disclosure of Material Information to all stakeholders. This policy applies so far as it does not conflict with LMLR and applicable laws and regulations.

For the purpose of this Policy, Material information is defined as:

- 1) Information as per Rule 6.08 of LEAP Market Listing Requirement ("LMLR") and relevant Practice Notes; and
- 2) Price sensitive information as per Section 185 of Capital Markets and Services Act 2007.

A. Principles of Disclosure

The Company is committed to the following principles in its disclosure of Material Information under provisions of this policy.

i. Transparency and accountability

Disclosure of corporate information shall be accurate and consistent, regardless of whether such information may have a positive or negative impact, in order to ensure transparency and accountability.

ii. Compliance with legal and regulatory requirements on disclosure

Disclosure of corporate information shall be in compliance with applicable legal and regulatory requirements.

iii. Confidentiality and timely disclosure

In order to ensure timely, accurate and fair disclosure, disclosure of material and non-public information shall be done in accordance with the conditions and procedures for maintaining the confidence of such information as well as public disclosure.

iv. Fair and equitable access to information

Material, non-public information shall be disclosed and disseminated in a manner which ensures fair and equitable access and by all stakeholders. Selective disclosure of such information to specific individuals or groups is avoided at all times unless confidentiality is fully secured by confidentiality agreements or other relevant measures.

B. Corporate Disclosure Mechanism

The Board assumes the overall responsibility to ensure that all Material Information is communicated to stakeholders impartially on timely, accurate, clear and complete manner per LMLR and other relevant laws and regulations, subject to review by the Continuing Adviser.

In order to discharge its duty and responsibility in respect of disclosure of Material Information, it is the Board responsibility to ensure that the Corporate Disclosure Policy is established and implemented effectively for the disclosure and dissemination of such Material Information. The Board assumes overall responsibility of the implementation of the Corporate Disclosure Policy and the mandatory disclosure requirement for other information per LMLR and applicable laws and regulations.

i. The Board

1. The Board is tasked with the responsibility to oversee all matters relating to Company's corporate disclosure practice and to ensure adherence to the Corporate Disclosure Policy.
2. The Board:-
 - a) To maintain awareness and understanding of the corporate disclosure requirements and any changes thereto;
 - b) To implement and monitor compliance with the Corporate Disclosure Policy and undertaking reviews of any violations, including assessment and implementation of appropriate consequences and actions;
 - c) To review and update the Corporate Disclosure Policy from time to time to ensure compliance with the LMLR and other regulatory requirements;
 - d) To disclose and disseminate Material Information in accordance with the Corporate Disclosure Policy and LMLR and other applicable laws and regulations;
 - e) To table a report the Board's Meeting on Material Information announced pursuant to this policy;
 - f) To ensure that all disclosure of Material Information is properly and adequately supported by appropriate approved documentation and is properly documented for future reference; and
 - g) To determine corporate development and transactions to be Material Information to be governed under this policy in the event of doubt.

3. The Board:-

- a) shall have the resources that are required to perform its duties. The Board can obtain, at the expense of the Company, outside legal or other independent professional advice it considers necessary; and
- b) shall have full and unlimited access to any information pertaining to the Company and its subsidiaries and to seek any information it requires from officers and employees.

ii. Authorised Spokesperson

- 1) The Authorised Spokesperson for the Group is the Chairman of the Board and the Chief Executive Officer, and any other director or officer as may be authorized by the Board from time to time;
- 2) The Authorised Spokesperson shall not disclose Material Information that has not been previously made public. He/she may, from time to time, respond inquiries from the investment community or media on information which is not Material Information or Material Information previously disclosed to the stakeholders and investing public (excluding details of the Material Information which is not disclosed to the stakeholders and investing public previously).
- 3) Employee, other than the Authorised Spokesperson, shall not respond to inquiries from any parties unless authorised to do so by Authorised Spokesperson (“Authorised Employee”).
- 4) In the event of doubt as to the information on-hand constitute Material Information, Authorised Spokesperson shall seek confirmation from the Board in confidence (by incorporating “Strictly Private and Confidential” on the caption of the communication medium) and such information shall be Material Information shall the Board determines as such in writing in confidence, either manually or electronically. In the event the information is determined as Material Information, such Material Information shall be disclosed per iii. below.
- 5) Authorised Spokesperson or Authorised Employee shall provide only factual, non-material and non-speculative information.

iii. Procedure for Disclosure of Material Information

- 1) The Board shall manage all of the Company’s release of announcements of Material Information to Bursa Malaysia Securities Berhad (“Bursa Securities”) through the Company Secretary.
- 2) All disclosure of Material Information shall only be made through Bursa Securities and no other means.
- 3) If the Board believes that the Material Information will be better understood and widely disseminated, the Company may request Bursa Securities for a voluntary suspension in the trading of the Company’s securities in accordance with the LMLR.
- 4) Upon being informed by the director of the Material Information, the Company Secretary shall draft the announcement of the Material information based on details provided by the director or any other designated personnel in accordance to the disclosure requirement under LMLR and other applicable laws and regulations. Such draft announcement shall be subject to the following review and approval prior to the release to the Bursa Securities:
 - i. Review by Finance and Accounts Department for financial information and other relevant departments for non-financial information, manually on the draft

- announcement or electronically through electronic mail contains such announcement uneditable; and
- ii. Review and approval by the Continuing Adviser and majority of the members of the Board (mandatory for approval from Chief Executive Officer) for the accuracy of the content of the announcement and compliance with LMLR and other applicable laws and regulations, manually on the draft announcement or electronically through electronic mail contains such announcement uneditable.
- 5) The Company Secretary or other designated personnel by the Chief Executive Officer shall maintain a record of the announcements made under this policy supported by all relevant supporting documentation properly reviewed and approved.
 - 6) The Company Secretary to compile and presented to the Board for review of announcements made under this policy during the forthcoming Board's meeting.

iv. Responding to Market Rumours

It is the Company's policy not to comment on market rumour and speculations. The Authorised Spokespersons shall respond consistently to rumour saying, "It is our policy not to comment on market rumour or speculation." However, if required by Bursa Securities, the Company will make due inquiry and immediately clarify, confirm or deny publicly the rumours through Bursa Securities.

v. Confidential Material Information

There are exceptional circumstances where the Company is allowed to withhold or delay disclosure of Material Information temporarily, provided that complete confidentiality is maintained ("confidential Material Information").

It is the responsibility of the Board as a whole to decide whether to temporarily withhold certain Material information not previously made public based on the following exceptional circumstances:

- (a) when disclosure would prejudice the ability of the listed issuer to pursue its corporate objectives; or
- (b) when the facts are in a state of flux; or
- (c) where company or securities laws restrict such disclosures

Shall such confidential Material Information being temporary withhold, the Board shall ensure the followings are carried out until the public dissemination of such Material Information publicly:

- To limit the dissemination of the confidential Material Information to officers and employees on "need-to-know" basis;
- To ensure that officers and employees privy to the confidential Material Information to sign a Confidentiality Agreement;
- Employees and officers with access to confidential Material Information to ensure total confidentiality of such sensitive information and refrain from divulging such information to any third party and discuss among themselves publicly until timely, fair and equitable disclosure is made to the public;
- All documentations and correspondence of such confidential Material Information shall be marked with "Strictly Private & Confidential" and shall be kept in secured location by the recipient of such confidential information. Shall such confidential

information is communicated through electronic mean, access to such electronic device shall be restricted to password access.

If anytime, confidential Material Information is inadvertently leaked resulting in selective disclosures, the Board will initiate a process immediately to ensure full and accurate public dissemination of such Material Information.

vi. The Company's website

The Company's website at www.manforce.net provides an avenue for the shareholders and the investing public to access information pertaining to the Company. It contains an "Investor Relations" section.

All disclosure and material information documents of interest to investors will be made available and accessible by the public on the website as soon as after their release through the newswire service. These include corporate proposals, meetings, announcements, financial reporting and all other announcements that are required pursuant to the LMLR.

The Group Corporate Finance Department is responsible for ensuring that the information contained in the "Investor Relations" section of the website is accurate and will be kept up-to-date.

vii. Periodic Review of Policy

The Policy may be reviewed from time to time and any material changes i.e. in compliance with LMLR, will be recommended to the Board for approval.

viii. Forward Looking Statement

The Company may provide forward-looking Statement to the investing public to enable reasoned evaluation of the Company and its future performance prospects provided that it is not undisclosed Material Information, it does not deal with future earnings, and it has been reviewed and approved by the Board.

ix. Non-Compliance

Any officer, employee and external service provider who violates the disclosure policy may face disciplinary action, which may result in the termination of employment and contract, subject to penalty to be determined by the Board.

If the Company discovers that an officer, employee and external service provider has violated such securities laws, it may refer the matter to the appropriate regulatory authorities, which can lead to penalties, fines and/or imprisonment.

Reviewed and updated on 23 August 2024