# Corporate Disclosure & Communication Policy

# Objective

MyAxis Group Berhad ("the Company") and its subsidiary companies (the "Group") are committed to provide timely, accurate and transparent disclosure of information. The Company's primary goals for external communication are:

- to coherently explain to the investing public the Company's view of its current and future performance;
- to foster rational, orderly behaviour in the capital markets with respect to the trading of the Company's securities; and
- to enhance and protect the Company's business reputation among all interested parties.

The Company will make an effort to ensure that all material information concerning the Group is made as freely and widely available as possible. The Group encourages an exchange of opinion between itself and its principal stakeholders, and will organise its communication channel to facilitate such dialogue.

# **Designated Spokesperson**

The Board of Directors shall elect spokesperson(s) to be responsible for the oversight and coordination of the disclosure of material information to the markets. The level of autonomy for the designated spokesperson is a matter for deliberation of the Board as a whole. Currently, the designated spokespersons are as follows:

- Chairman;
- Group Managing Directors;
- Executive Directors;
- Group Chief Financial Officer; and
- Delegates nominated by spokespersons.

# Timely disclosure in accordance with the Listing Requirements

Immediate announcements in accordance with the Listing Requirements ("LR") as set out by Bursa Malaysia must be made in a timely manner. Once the contents of the information have been made available to the Company Secretary, the Company Secretary is responsible for the timely disclosure of the information in accordance with the disclosure obligations set out in the LR.

All announcements made are to adhere to the following protocols:

- any relevant parties referenced in the announcement should also review the announcement prior to its release, to confirm the accuracy of the information;
- the Chairman or any Executive Director shall approve the announcement before release to Bursa Malaysia; and
- all announcements are to be circulated to all members of the Board upon announcement.

# Material information

Immediate announcements must be made of material information in accordance with the Listing Requirements set out by Bursa Malaysia. A general guideline to determine materiality is if the information is reasonably expected to impact on:

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

In relation to any material information that is being withheld temporarily, the Company is committed to ensuring strictest confidentiality is maintained.

Disclosures made are to adhere to the following protocols:

- any relevant parties referenced in the announcement should also review the announcement prior to its release, to confirm the accuracy of the information;
- the Chairman or any Executive Director shall approve the announcement before release to Bursa Malaysia; and
- all announcements are to be circulated to all members of the Board upon announcement.

# **Reports and Events**

Reports and events through which the Company communicates with its shareholders and stakeholders include but not limited to the following:

- Semi-Annual Financial Reports;
- Annual Report;
- General Meeting;
- Briefings and Press Conferences;
- Meetings and Interviews with Investors, Analysts and the Media; and
- Major Corporate Developments.

The Company shall circulate the minutes of general meetings to shareholders no later than 30 business days after the general meeting.

### **Market rumors**

The Company's general policy on responding to market speculation and rumors is that "the company does not respond to market speculation or rumors". Notwithstanding the Company's no comment policy, the Company may issue a statement/announcement to Bursa Malaysia in relation to market speculation or rumor where:

- The Company considers it has an obligation at that time to make a statement to the market about a particular matter; or
- The Company is required to respond to a formal request from Bursa Malaysia and/or other relevant authorities for information; or

If circumstances warrant and with the consensus of the Executive Directors available at the point of time, the Company will be prepared to place a trading halt on its securities in order to properly address the matter. Any clarification provided will be in a published format, for the purpose of dissemination to the investing public.

### **Unusual Market Activity**

The Company shall carry out an enquiry to ascertain the cause of any unusual market activity in its securities. In the case of any misinterpretations, clarification shall be provided via the appropriate channels in Bursa Malaysia.

## **Insider Trading**

The Company affirms its awareness of the provisions of Section 188 of the Capital Markets and Services Act 2007 in regards to insider trading. Directors, Management and employees of the Company and its subsidiaries shall not trade on the basis of any material information that has not been disclosed to the public. Details on prohibiting insider trading are provided in the Insider Trading Policy.

### **Review of analyst reports**

The Company recognises the important role performed by analysts in assisting the establishment of an efficient market with respect to the Company's securities. However, the Company is not responsible for, and does not endorse, analyst reports that contain commentary on the Company.

A standard disclaimer will be provided in any response made to an analyst.

# **Confidential information**

In general, all information regarding the Group, 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 available to the public. As a means to protect confidential information, access to information shall be restricted only to relevant

persons who have a legitimate reason consistent with their duties or obligations to the Company or its subsidiaries.

#### Leakage and accidental disclosure

In the event of an information leakage or accidental disclosure of unpublished material information, the situation should be addressed to the Executive Directors. If deemed necessary, the Company will make an appropriate announcement to the Bursa Malaysia as soon as possible, which may be followed by a press release and/or other communication methods.

All covered persons are discouraged to participate in any form of exchange of information and comment on the Group's affairs to external parties.

Unless there are adequate existing legal protections, execution of non-disclosure and confidentiality agreements shall be required from third parties (e.g. auditors, bankers, lawyers, advisors) provided with unpublished material information of the Group.

### **Contact Details**

The primary contact persons for Bursa Malaysia matters are as follows:

#### Company Secretary

347-V Tingkat Pemancar 11700 Gelugor, Penang +6016-9311246

#### **Group Chief Financial Officer**

B72 & B73, Taman Perindustrian Tandop Utama, Jalan Tandop 5, Lebuhraya Sultanah Bahiyah, 05050 Alor Setar, Kedah +6018-2880628

This policy is dated 03 June 2025