

SINMAH CAPITAL BERHAD CORPORATE DISCLOSURE POLICY

Sinmah Capital Berhad (“SCB” or “the Company”) is committed to fair disclosure of information based on applicable laws and regulations of Malaysia. This policy deals with disclosure-related matters practised by SCB as follows:

1. Information Covered By This Policy

This policy covers “material information” as stipulated by applicable laws and regulations of Malaysia. This includes information related to corporate decisions and occurrence of material facts as stipulated in the Bursa Malaysia Securities Berhad’s Listing Requirements (“Listing Requirements”). SCB is committed to the Listing Requirements policy of timely information disclosure and financial statements to stakeholders.

2. Basic Principles Regarding the Disclosure of Material Information

SCB discloses material information based on the following five principles:

- i. Transparency*
SCB discloses information based on a factual basis.
- ii. Timeliness*
SCB discloses information promptly, without delay, following occurrences that warrant disclosure.
- iii. Fairness*
SCB disperses information fairly to our various stakeholders.
- iv. Continuity*
SCB discloses information in a steady, continuous manner.
- v. Confidentiality*
SCB does not provide information to third persons before information has officially been announced by the Company.

3. Role of Corporate Representative

SCB has appointed a Corporate Representative from among its Board members. The Corporate Representative is responsible for approving all information to be released to Bursa Malaysia Securities Berhad (“BMSB”).

4. Framework for Disclosure of Material Information

SCB’s internal framework for disclosing material information is as follows:

1. Timely Information Disclosure in Accordance with the Listing Requirements

At SCB, the Corporate Affairs Division, headed by its Director is responsible for the timely disclosure of information to BMSB on a day-to-day basis. The Corporate Affairs Division will evaluate if an occurrence warrants disclosure or not. Once, the Corporate Affairs Division has established that a disclosure is warranted, the Company Secretary or Advisors, as the case may be, will be contacted to draft the necessary announcement. The draft announcement is then vetted by the Corporate Affairs Division and if found to be in order, the Corporate Representative’s approval is procured for the release of the announcement by the Company Secretary or Advisors.

2. Other Disclosure Requirements

Apart from the timely information disclosure stipulated by the Listing Requirements above, SCB also provides information on a periodic basis pertaining to the following:

- i. Quarterly Reports
- ii. Audited Financial Statements
- iii. Semi-Annual Returns
- iv. Annual Reports

For these disclosures, Board approval is obtained prior to release to BMSB. Once Board approval is obtained, the Corporate Affairs Division will procure the Corporate Representative's approval of the draft announcement, to authorise the Company Secretary to release the announcement to BMSB.

5. Others

1. Market Rumours

In general, SCB does not respond to inquiries regarding market rumours. However in some cases, SCB may respond to a rumour when not responding could have serious ramifications for the Company.

2. Closed Period

During Closed Period, the Directors and the Principal Officers of the Company or its major subsidiary who are in possession of price-sensitive information in relation to the Company's securities, should refrain from dealing in the Company's securities. If they wish to deal in the Company's securities during the Closed Period, the following conditions should be complied with:-

- (a) prior to the proposed dealing, notice of intention to deal must be given in writing to the Company Secretary for an immediate announcement to be made to Bursa Malaysia Securities Berhad stating the following:-
 - i) current holdings of securities in the Company; and
 - ii) intention to deal in the securities of the Company during a closed period.
- (b) after the dealing has occurred, notice of dealing must be given in writing to the Company Secretary within one (1) full market day after the dealing has occurred for an announcement to be made to Bursa Malaysia Securities Berhad stating the following:
 - i) the date on which the dealing occurred;
 - ii) the consideration for the dealing;
 - 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 Company.

Notes:

- (1) *Principal Officers include the chief executive officer who is not a director, the chief financial officer or any other employee of the Company or its major subsidiaries respectively who has access or privy to price-sensitive information of the Company.*
- (2) *Major Subsidiary means subsidiary which contributes 75% or more of the profit before tax or total assets employed of the Group.*

3. *Review of this Policy*

This policy shall be subject to review should there be any changes to the laws and regulations.

Date of Review: 28 November 2018