

# CORPORATE DISCLOSURE POLICY

## Introduction

JCY International Berhad (“JCY” 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.

## Scope

This policy should cover the disclosure requirements as stated in the main market Listing Requirements of Bursa Malaysia Securities Berhad and material information as defined below that relates to the Company and its subsidiaries.

The directors of the Company, the Company Secretary, all employees of the Company and its subsidiaries shall observe the provision of this policy.

## Exclusion

This policy does not cover:-

- a. material information that is already in the public domain;
- b. material information that is not generated or owned by the Company;
- c. material information that summarises, realigns or is computed from material information that already in the public domain.

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.

## 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.

## 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:-

- a. materially accurate and true
- b. free from material omission
- c. consistent and not selective
- d. fairly accessible to all parties;
- e. in the best interest of the Company and its shareholders in general.

**Public Disclosure**

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

**Disclosure Committee**

A Disclosure Committee which consists of all Executive Directors, Financial Controller and Investor Relation Officer of the Group is established to operate and maintain this policy.

**Spokesman**

Only the Chairman, Executive Directors and Investor Relation Officer are the authorized spokesman of the Company. Other persons may be a temporary spokesman of the Company if so authorized by the Board of Directors.

Upon approval from the Board, the spokesman of the Company is allowed to approve announcements and press releases, clarify rumours and authorize the publication of contents on the Company's website on behalf of the Company.

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

**Accuracy, Transparency and Depth of Information**

The Disclosure Committee 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.

**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 the information has become common knowledge to the general public.

**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.

**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.

**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.

**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.

**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.

**Website**

The Company's website ([www.jcyinternational.com](http://www.jcyinternational.com)) 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 website.

**Closed Period**

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 share during closed period.

Closed Period is the one month period before a quarterly result is scheduled to be announced.

**Prohibition of insider-trading**

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

**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.