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KUMPULAN PERANGSANG SELANGOR BERHAD

197501002218 (23737-K)

COMMUNICATIONS POLICY

VERSION 1/2024

APPROVED BY THE BOARD ON

27 AUGUST 2024

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1. INTRODUCTION

Our vision, "Leading investments for shared prosperity," our mission, "Cultivating value, creating positive impact," and our core value, PRIDE, are foundational elements that shape and guide Kumpulan Perangsang Selangor Berhad's ("KPS Berhad" or "the Company")'s Communications Policy ("the Policy").

The Policy guides our interactions with stakeholders, ensuring the communications are aligned with the corporate objectives of KPS Berhad and its subsidiary companies ("the Group"), building a cohesive brand voice and maintaining a unified message across various communication platforms.

Internal stakeholders are individuals or groups within KPS Berhad who are directly involved in and affected by the Group's activities. Key internal stakeholders for KPS Berhad include its Board of Directors, the Management team, and employees. Whereas, external stakeholders are individuals or groups outside KPS Berhad who are affected by or have an interest in the Group's operations and outcomes. They key external stakeholders include, for instance, the customers, suppliers and vendors, investors, the banks, the state and federal governments and their agencies, the local community, the media, business competitors and the NGOs.

OUR VISION

Leading investments for shared prosperity.

OUR MISSION

Cultivating Value, Creating Positive Impact

OUR TAGLINE

We Invest in Better

CORE VALUES

Pride
Respect
Integrity
Discipline
Extra-mile

2. ASPECT OF THE POLICY

The Policy outlines the guidelines and standards for internal and external communications within KPS Berhad. Common aspects of this Policy include:

2.1. Scope

The Policy applies to KPS Berhad's Board members, employees, consultants, and agencies providing services to KPS Berhad under the direction of KPS Berhad's representatives.

The Policy governs all verbal and written statements, including annual reports, press releases, letters to shareholders or employees, management statements, information on the Company's digital communication platforms, public registers, and other external and internal communications content.

2.2. Responsibility

The Director of the Investor Relations, Sustainability, and Communications Department ("IRSC") is responsible for overseeing the implementation and adherence of this Policy.

As the custodian of this Policy, the IRSC Department is responsible for its ongoing development, maintenance, and distribution.

2.3. Approving Authority

The Board holds the authority to approve this Policy document.

2.4. Date of Implementation

The Policy is effective immediately upon approval by the Board.

2.5. Review Frequency

The Policy will be reviewed once every three (3) years, at the minimum, to ensure that it remains consistent with the overall Company's objectives with current changes and updates on relevant rules and legislation.

2.6. References

This Policy shall be read in conjunction with the Malaysian Code on Corporate Governance and its disclosure obligations contained in the Bursa Securities MMLR, with which the Company is bound to comply, and any other relevant internal policies and procedures documents of KPS Berhad.

Guiding Principles:

2.6.1. Paragraph 9.02 of Bursa Securities' Main Market Listing Requirements ("MMLR") – Corporate Disclosure Policy.

2.6.2. Paragraph 9.03 of Bursa Securities' MMLR – Disclosure of Material Information.

2.6.3. Paragraph 9.08 of Bursa Securities' MMLR – Thorough Public Dissemination.

2.6.4. Paragraph 9.17 of Bursa Securities' MMLR – Preparation of Press or Other Public Announcements.

2.6.5. Copyright Act (1987).

2.6.6. KPS Berhad's Investor Relations Policy.

2.6.7. KPS Berhad's Business Continuity Management Policy.

2.6.8. KPS Berhad's Data Protection Framework.

3. **OBJECTIVE OF THE POLICY**

KPS Berhad shall respond effectively to communication demands and demonstrate the relevance of its business and services to its stakeholders. This Policy aims to:

3.1. Provide holistic management of the governance process and maintain a positive image and reputation.

3.2. Ensure that information is disseminated in accordance with all applicable laws and regulations.

3.3. Enhance the Group's profile and positioning among stakeholders through consistent, transparent, timely, and strategically aligned communications.

3.4. Foster effective internal and external communication between KPS Berhad and the stakeholders, building strong brand equity and garnering stakeholder trust and loyalty.

4. STATEMENT OF POLICY

KPS Berhad is committed to building strong relationships with internal and external stakeholders. The Policy ensures that information about the Group's business affairs, progress, and achievements in financial and non-financial areas is communicated accurately, timely, and comprehensibly, with the aim to streamline and manage the flow of information within the Group.

4.1. Authorised Spokespersons

4.1.1. Authorised spokespersons communicate the Group's affairs, business, and prospects to internal and external parties.

4.1.2. The Managing Director/Group Chief Executive Officer ("MD/GCEO") is the primary spokesperson for KPS Berhad.

4.1.3. The Director of IRSC is the secondary spokesperson.

4.1.4. The MD/GCEO has the authority to delegate these responsibilities to the Deputy Chief Executive Officers ("DCEOs"), and the Chief Sustainability Office ("CSO").

4.1.5. Communications on behalf of the Company to the shareholders and members of the investment community are limited to the MD/GCEO, Deputy Chief Executive Officer of Financial Corporate Services ("DCEOFCS"), Deputy Chief Executive Officer of Strategy & Investment ("DCEOSI"), and Director, IRSC.

4.2. Guidelines for Content Development

4.2.1. Content should be accurate, relevant, and engaging, reflecting the Company's goals and values. The Director of IRSC oversees the creation of KPS Berhad's strategic narratives and key messages, with subject matter experts contributing insights related to their areas.

4.2.2. Content must be thoroughly researched, consistently branded, and approved before publication. Adherence to legal and ethical standards, including copyright and data protection, is crucial. Additionally, content should be updated regularly to stay relevant, and feedback from stakeholders should be actively monitored and integrated.

4.3. **Internal Communication**

The primary objective of this procedure is to establish clear and effective internal communication procedures to ensure timely, consistent, and transparent communication across all levels of KPS Berhad. It establishes guidelines for the types of communication methods used, as well as the roles and responsibilities of employees in the communication process.

The procedures aim to ensure that all team members are well-informed, promote transparency, foster a collaborative work environment, and enhance overall organisational effectiveness by improving the flow of information.

4.3.1. Roles and Responsibilities
 4.3.1.1. Management
    a. Set the tone for effective communication by modelling best practices.
    b. Ensure that all team members are informed about relevant information.
    c. Provide regular updates on organisational changes and developments.
    d. Encourage open communication and feedback

 4.3.1.2. Employees
    a. Adhere to the communication procedures outlined in this Policy.
    b. Use appropriate channels for communication.
    c. Provide timely and constructive feedback. Respect confidentiality and privacy in all communications.

 4.3.1.3. IT Department
    a. Maintain and support communication tools and systems.
    b. Provide training and resources for effective use of communication technologies.
    c. Ensure security and privacy of communication systems.

4.3.2. Communication Channels

Verbal Mode	Written Mode
Microsoft Teams (Ms Teams) Video Meeting	Email
Corporate Meeting	Ms Teams
Townhall	WhatsApp group
Induction	Social Media (Instagram, LinkedIn)
Weekly Meeting	

4.3.3. Communication Guidelines

4.3.3.1. Clarity and Conciseness
   a. Communicate clearly and avoid jargon or technical language unless necessary.
   b. Be concise and get to the point quickly.
   c. Ensure the message is understandable to all intended recipients.

4.3.3.2. Timeliness
   a. Share information promptly to ensure it is relevant and actionable.
   b. Respond to communications in a timely manner.

4.3.3.3. Confidentiality
   a. Respect confidentiality and privacy in all communications.
   b. Avoid sharing sensitive information through unsecured channels.
   c. Follow company policies regarding data protection and information security.

4.3.3.4. Respect and Professionalism
   a. Maintain a professional tone in all communications.
   b. Show respect for colleagues' opinions and contributions.
   c. Avoid negative or inflammatory language.

4.4. **External Communication**

The primary objective of this procedure is to establish clear guidelines for all external communications to ensure that our messaging is consistent, accurate, and aligned with KPS Berhad's values and corporate objectives. It aims to protect the Group's reputation and positive image, enhance stakeholder engagement, and ensure compliance with legal and regulatory requirements.

It covers all forms of external communication, including but not limited to press releases, social media, public statements, marketing materials, and correspondence with external stakeholder such as the customers, suppliers and vendors, investors, the banks, the state and federal governments and their agencies, the local community, the media, and the NGOs.

4.4.1. Roles and Responsibilities

4.4.1.1. MD/GCEO
   a. Oversee KPS Berhad's strategy in its communications with the governments and their agencies, and other stakeholders.
   b. Act as the primary spokesperson when communicating with the governments and their agencies, and other external stakeholders.

4.4.1.2. The Management
   a. Approve other key messages and communication strategies.
   b. Act as spokespersons where applicable.
   c. Ensure all external communications align with KPS Berhad's values, strategic objectives, corporate policies and compliance, and applicable laws and regulations.

4.4.1.3. Employees
   a. Adhere to the guidelines outlined in this Policy.
   b. Seek approval for external communications where necessary.
   c. Represent the Group professionally and positively in all external engagements.

4.4.1.4. IRSC Department
   a. Develop and implement external communication strategies.
   b. Prepare and disseminate press releases and other public statements.
   c. Monitor and manage the organisation's social media presence.
   d. Provide guidance and training on external communication practices.

4.4.2. Communication Mediums
   4.4.2.1. Press Releases & Media Interviews
      a. Preparation
         i. The Communication Unit of IRSC will prepare all press releases after consulting with the respective subject matter experts.

         ii. For any other topics regarding the Group's business, the subject matter expert will assist the Communication Unit of IRSC in developing and reviewing key messages and questions and answers (Q&A) to ensure the accuracy, consistency and timeliness of information reported.

      b. Review and Approval
         i. All media releases must undergo review and approval by the MD/GCEO before distribution. Subject matter experts from relevant business units may also participate in the review and approval process.

ii. Specifically, any release discussing the financial performance of KPS Berhad – including revenue projections, market projections, or any content that could impact KPS Berhad's share price – must receive approval from the MD/GCEO prior to distribution.

c. Distribution
Distribute press releases through appropriate channels to reach the target audience.

4.4.2.2. Briefings, Conferences, and Teleconferences

a. Preparation
All external teleconferences with public audiences, as well as news conferences and briefings, must be arranged in consultation with the IRSC Department, MD/GCEO, and relevant HODs where appropriate.

b. Review and Approval
The MD/GCEO must approve all external teleconferences, news conferences, and briefings that are material and sensitive in nature. Depending on the subject matter, the DCEOs and KPS Berhad's legal counsel may be required to participate in the review and approval process.

c. Distribution
Distribute factsheets, presentation slides or other types of communication materials related to the topic of discussion to the target audience.

4.4.2.3. Social Media
Social media platforms are essential for engaging with stakeholders, sharing important updates, and promoting KPS Berhad. They enable us to build relationships by addressing stakeholder interests, informing our audience about key developments, and showcasing our initiatives and achievements.

The Communication Unit of IRSC is responsible for monitoring the Company's social media accounts regularly, responding to inquiries promptly, and ensuring sensitive or confidential information is not disclosed.

a. Preparation

Social media posting involves a series of crucial steps for crafting and delivering an engaging and effective message, as outlined below.

i. Content Planning
- Decide on the type of content (e.g., text, image, video, infographic).
- Create a content calendar to schedule posts and maintain consistency.
- Gather information pertaining to the content from subject matter experts
- Write engaging and relevant copy tailored to the audience
- Maintain a consistent and professional tone across all social media platforms.

ii. Permissible Content
- Corporate news and events include launches.
- Press conference and financial results.
- Sustainability programmes and updates.

iii. Impermissible Content
- Information not intended for public dissemination should not be posted on social media
- platforms.
- Employees must not disclose confidential or proprietary information about KPS Berhad's
- employees, customers, or business partners on social networks.
- Postings on sensitive and material matters are prohibited.

iv. Design and Visuals
- Create or source high-quality images, graphics, or videos.
- Ensure visuals align with the brand's style and message.
- Use design tools like Adobe Photoshop and Adobe Illustrator if needed

b. Review and approval
The Director of IRSC is responsible for reviewing and approving postings to ensure alignment with the Company's objectives and corporate messaging.

c. Distribution
The Communication Unit manages the posting of content across all of KPS Berhad's social media platforms

4.4.2.4. Public Statements
A public statement will be used to communicate important information, clarify KPS Berhad's positions, provide updates, or address key issues, ensuring that stakeholders are well-informed and that the Company's stance or actions are clearly articulated.

a. Preparation
All public statements must be developed in consultation with the IRSC Department, the MD/GCEO, and relevant Heads of Departments as appropriate.

If a statement needs to be delivered in person, designated spokespersons must be authorised to represent the organisation.

IRSC will prepare the spokesperson by providing key messages and talking points, with guidance from subject matter experts.

b. Review and approval
The MD/GCEO must approve all public statements that are material and sensitive in nature. Depending on the subject matter, the DCEOs and KPS Berhad's legal counsel may be required to participate in the review and approval process.

c. Distribution
The statement will be distributed via the most effective platforms, such as press releases, social media, or company websites, to ensure the statement reaches the intended audience effectively across press releases through appropriate channels to reach the target audience.

4.4.2.5. Marketing Materials

a. Preparation

All marketing materials must be developed in consultation with the IRSC Department and adhere to the Company's brand guidelines. To ensure consistency and effectiveness, these materials must align with KPS Berhad's branding and messaging.

Marketing content must also be regularly reviewed and updated to maintain relevance and accuracy.

b. Review and approval

The Director of IRSC is responsible for reviewing and approving the marketing materials for promotion purposes.

The MD/GCEO's approval is required for statutory reports, namely KPS Berhad's Integrated and Sustainability Report.

c. Distribution

Marketing materials will be distributed through carefully chosen channels to maximise their impact. This process involves identifying the most effective platforms based on KPS Berhad's target audience, such as direct mail, email campaigns, social media, or in-person events.

4.4.2.6. Correspondence with Stakeholders

a. Preparation

All correspondence should employ professional and courteous language, accurately reflecting KPS Berhad's values. It is important to ensure that all correspondence is precise and aligns with the Company's standards. Additionally, inquiries and requests must be addressed in a timely manner to maintain effective and respectful interactions.

b. Review and approval

All correspondence must be reviewed and approved by the respective HODs. If necessary, the IRSC can assist in the preparation of the correspondence.

The MD/GCEO must review and approve the content for material and sensitive topics. Depending on the subject matter, the DCEOs and KPS Berhad's legal counsel may also need to be involved in the review and approval process.

c. Distribution
Correspondence with stakeholders should be distributed systematically, targeting relevant stakeholders with tailored content. Based on their preferences and the nature of the communication, choose appropriate channels—such as email, postal mail, or digital platforms.

4.4.2.7. General Inquiries and Requests
a. Preparation
All media inquiries or requests for interviews, statements, or information must be forwarded to the IRSC Department for action. The Communication Unit will then follow up internally with the respective subject matter experts.

b. Review and approval
All correspondence must be reviewed and approved by the respective HODs. If necessary, the IRSC can assist in the preparation of the correspondence.

The MD/GCEO must review and approve the content for material and sensitive topics. Depending on the subject matter, the DCEOs and KPS Berhad's legal counsel may also need to be involved in the review and approval process.

c. Distribution
Correspondence with stakeholders should be distributed systematically, targeting relevant stakeholders with tailored content. Based on their preferences and the nature of the communication, choose appropriate channels—such as email, postal mail, or digital platforms.

4.4.3. Guidelines When Communicating with External Stakeholders

4.4.3.1. Creating a comprehensive procedure for communicating with our external stakeholders ensures that interactions are consistent, professional, and aligned with KPS Berhad's corporate and business objectives. Below is a structured procedure to guide communication with external stakeholders, facilitating effective communication with external stakeholders, fostering positive relationships, and enhancing the Group's reputation and image:

a. Consistency
i. Ensure all external communications align with KPS Berhad's messaging and branding.
ii. Utilise approved templates and formats for official documents and presentations.

    b.   Accuracy
       i.   Verify the accuracy of information before sharing it externally.
      ii.   Correct any misinformation promptly and transparently.

    c.   Transparency
       i.   Communicate openly and honestly with stakeholders.
      ii.   Disclose relevant information while respecting confidentiality and privacy.

    d.   Professionalism
       i.   Maintain a professional tone in all external communications.
      ii.   Show respect for stakeholders and avoid negative or inflammatory language.

    e.   Legal and Regulatory Compliance
       i.   Ensure all communications comply with applicable laws and regulations
      ii.   Obtain legal review of communications when necessary.

4.5. **Crisis Communications**

Effective communication during a crisis is vital to managing and mitigating the impact on KPS Berhad. This procedure provides guidelines for communication during a crisis, ensuring the safety of stakeholders and maintaining organisational integrity. Consistent, accurate and timely dissemination of information during crisis is aimed to:

- Ensure the safety and well-being of all stakeholders;
- Provide accurate and timely information;
- Maintain KPS Berhad's reputation and trust amongst its stakeholders;
- Minimise confusion and misinformation, and
- Facilitate efficient recovery and resolution.

4.5.1. Roles and Responsibilities
    4.5.1.1. Recovery Director of Business Continuity Management

    He/She will assess the situation to determine if it qualifies as a crisis. This involves evaluating the severity and impact of the issue to understand its implications to KPS Berhad.

    If it is deemed a crisis, the Recovery Director will promptly activate the Crisis Management Team (CMT).

The CMT will be responsible for coordinating the response, managing communication, and implementing strategies to address the crisis effectively.

4.5.1.2. Spokesperson
The designated spokesperson will represent KPS Berhad in media interviews to effectively communicate the Company's position and response to inquiry.

4.5.1.3. MD/Group CEO
Approve all crisis-related content, with the advice of the Recovery Director for the Business Continuity Management.

4.5.1.4. Head of IRSC
Upon activation of the CMT, the IRSC will collaborate with the CMT to strategise communication with relevant stakeholders, ensuring message consistency.

The IRSC will lead the crisis communication efforts by determining key messages tailored for different stakeholders and prioritising communication channels based on urgency and reach.

He/She will lead the crafting of messages and distribution of press releases and internal crisis communications while also developing a communication schedule.

An initial statement will be issued within the first hour of the crisis, followed by regular updates as the situation develops.

Additionally, the IRSC will monitor media coverage and manage social media to gauge public perception and address any misinformation. The communication strategy will be adjusted as necessary, and the Crisis Communication Plan will be updated based on lessons learned.

4.5.1.5. Director, Human Resources Department
He/She will keep the employees informed about the crisis and response efforts as directed by the Recovery Director.

4.5.1.6. Director, Legal & Compliance Department
He/She will review all communications for potential legal implications and ensure compliance with regulatory requirements.

Provide guidance on legal considerations and regulatory obligations to ensure that all communications adhere to relevant laws and standards.

4.5.2. Material/Correspondence Preparation
    4.5.2.1. Information Gathering
        a. Begin by gathering all relevant facts about the crisis, ensuring the accuracy of the information collected.
        b. Document the timeline and key events to provide a comprehensive situation overview.
        c. Notify the CMT to ensure they are informed and prepared to respond.
        d. The Head of IRSC should then review the communication to ensure it is accurate and aligns with the Company's protocols before dissemination.

4.5.3. Post-Crisis Review.
    4.5.3.1. Conduct a debriefing with the CMT.
    4.5.3.2. Evaluate the effectiveness of the communication efforts.

4.5.4. Crisis Communication Channels
    4.5.4.1. Internal
        a. Email
        b. Microsoft Sharepoint
        c. Internal meetings
        d. SMS/Text messaging/WhatsApp Group

    4.5.4.2. External
        a. Press releases
        b. KPS Berhad's website
        c. Media briefings
        d. Social media platforms
        e. Possibly, community meeting

4.5.5. Guidelines on Developing Key Messages During Crisis
    4.5.5.1. Acknowledge the situation and express concern for those affected.
    4.5.5.2. Outline steps that KPS Berhad is taking to address the crisis.
    4.5.5.3. Provide reassurance about KPS Berhad's ability to manage the situation.
    4.5.5.4. Share accurate and timely information while maintaining confidentiality where necessary.

4.6. **Maintaining Confidentiality**

4.6.1. At the discretion of the MD/GCEO and/or the Management, information can be regarded as material, confidential, and sensitive. This information must be shared strictly on a need-to-know basis.

4.6.2. Access to material, confidential and sensitive information must be limited to authorised personnel only.

4.6.3. All communication materials must adhere to data protection laws and the Company's policies. Sensitive or confidential information should only be shared with proper authorisation.

4.7. **Public Use of KPS Berhad's Name or Logo**

All requests involving the use of KPS Berhad's name or logo (or the logos of any of the Company's divisions, affiliates, or subsidiaries) must be cleared in advance with the IRSC Department. The use of the Company's logo should conform to KPS Berhad's Corporate Identity Manual.

5. MANAGEMENT & DOCUMENT CONTROL

The IRSC Department will review this Policy and seek the Board's approval from KPS Berhad whenever there are changes to the Group's communication approach. This ensures the Policy remains relevant and appropriate, reflecting any updates in applicable guidelines, regulations, or existing practices.

6. EXCEPTION

Any exception to the Policy shall require approval of the Board unless it is deemed operational.

7. DEFINITION OF TERMS

Authorised Spokesperson	The primary and secondary authorised spokespersons are the MD/Group CEO and the Director of IRSC, respectively.
Corporate Communications	Activities undertaken by KPS Berhad include communicating with internal and external stakeholders and the wider public. The term emphasises promoting a sense of corporate identity and ownership, thus presenting a consistent and coherent corporate image.
Corporate Identity	Visual identifiers approved to present a uniform and consistent visual identity are assets in the Company's Visual Identity Guidelines.
Crisis Communication	Crisis communication is designed to protect KPS Berhad in case of a swelling public challenge to its reputation, brand, or both.
Internal communication	Information and messages are exchanged between employees or departments across all levels or divisions within the Group.
External communication	The exchange of information and messages between KPS Berhad and organisations, groups, or individuals outside its formal structure.
Investment Community	An investment community refers to a broad group of individuals and organisations involved in the financial markets and the investment ecosystem, each playing a distinct role in the flow of capital and the functioning of financial markets. The investment community includes, for instance, regulatory bodies, the exchange, individual investors, institutional investors, investment banks, research houses, asset management firms, private equity firms, and financial advisors.
Material Information	Any information relating to the business and affairs of the Group that results in, or would reasonably be expected to result in, a significant influence on a reasonable stakeholders' perception of the Group's image or change in investors' investment decisions resulting in movement in the market price or value of the Company's securities.
Media	A means of communication that reaches or influences people widely and rapidly where necessary.
Stakeholder	A person, group or organisation with a stake or interest in KPS Berhad.
Subsidiary Companies	This means investee companies for which KPS Berhad own a majority stake of more than 51% shareholding. This includes such companies as Toyoplas Manufacturing (Malaysia) Sdn Bhd ("Toyoplas"), CPI (Penang) Sdn Bhd ("CPI"), MDS Advance Sdn Bhd ("MDS Advance"), Century Bond Bhd ("CBB"), Aqua-Flo Sdn Bhd ("AquaFlo"), Smartpipe Technology Sdn Bhd ("Smartpipe") and KPS-HCM Sdn Bhd ("KPS-HCM").

- End -