



KUMPULAN PERANGSANG SELANGOR BERHAD

197501002218 (23737-K)

INVESTOR RELATIONS POLICY

VERSION 3/2024

APPROVED BY THE BOARD ON

27 AUGUST 2024

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1. INTRODUCTION

As a public listed company, Kumpulan Perangsang Selangor Berhad (“KPS Berhad” or “the Company”) is committed to providing coherent, transparent, accurate, timely, orderly, consistent, non-selective, and credible information to the shareholders, stakeholders and public, in accordance with regulatory requirements, to develop and maintain realistic investor expectations in line with Bursa Malaysia Securities Berhad (“Bursa Securities”)’ Main Market Listing Requirement (“MMLR”) of Chapter 9, Continuing Disclosure.

All information pertaining to corporate governance, management, operations, financial situation, industry prospects and growth strategies is directed at shareholders, stakeholders, and the public at large with the intention to fairly and accurately represent the Company to facilitate existing and potential investors to make well-informed investment decisions, and others to have a balanced understanding of the Company and its goals.

It is imperative that this continues to be accomplished consistently for both positive and negative information and that all parties in the investment community have fair access to this information.

This Policy shall act as:

- i) Compliance with Bursa Securities’ guidelines and other governing laws and regulations regarding disclosure of material information about KPS Berhad; and
- ii) Management of realistic investor expectations by making all required disclosures on a broadly disseminated basis with a balanced view of the prospects for KPS Berhad and its business.

This policy covers disclosures in documents filed with Bursa Securities and Companies Commission Malaysia (CCM) and written statements made in the Company's annual and quarterly reports, press releases, letters and circulars to shareholders, business presentations, marketing materials, advertisements, and information contained on the Company's website and other electronic communications. It also extends to oral statements made in meetings and telephone conversations with analysts and investors, interviews with the media, speeches, press conferences, and conference calls.

1.1 Scope

The investor relations (“IR”) Policy applies to the Board of Directors and employees of KPS Berhad and its subsidiary companies (“ the Group”).

1.2 Responsibility

It is the responsibility of the Director of Investor Relations, Sustainability and Communications (“IRSC”) department to monitor the relevance and adequacy of the IR Policy, taking into consideration KPS Berhad’s operations and changes in the prevailing rules/regulations/laws.

1.3 Approving Authority

The Board of Directors of KPS Berhad (“the Board”) is the approving authority of this Policy document.

1.4 Date of Implementation

The Policy is effective immediately upon approval by the Board.

1.5 Review Frequency

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

1.6 Reference

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:

- i) Paragraph 9.02 of Bursa Securities' MMLR - Corporate Disclosure Policy.
- ii) Paragraph 9.03 of Bursa Securities' MMLR - Disclosure of Material Information.
- iii) Paragraph 9.08 of Bursa Securities' MMLR - Thorough Public Dissemination.
- iv) Paragraph 9.17 of Bursa Securities' MMLR - Preparation of Press or Other Public Announcements

2. OBJECTIVE OF THE POLICY

KPS Berhad strives to maintain its corporate credibility and develop investors' confidence in the Company by practising a structured approach on the communicating of material information.

2.1 This IR Policy shall:

- i) Serve as a statement to the Company's shareholders and other stakeholders on how KPS Berhad intends to keep them informed of material developments and maintain effective communications with them;
- ii) Provide a framework of processes and procedures upon which the Company can successfully implement its IR programme.;

2.2 The Company's IR programme is formulated to be proactive and interactive based on the following principles:

- i) The Company shall provide reports of its financial results and material developments to Bursa Securities, shareholders and other stakeholders in a transparent and comprehensive manner;
- ii) The Company shall communicate only through authorised spokespersons;
- iii) The Company's website shall be the additional primary channel of communications;
- iv) The Company shall address and promptly respond to reports and rumours to avoid unnecessary speculation in its securities;
- v) The Company shall provide reasonable access and assistance to institutional research analysts, professional fund managers, and mass media to have informed opinions of the Company but will not seek to influence those opinions; and
- vi) The Company shall strive to communicate with substantial shareholders at least once in each fiscal year to gather feedback on the Company.

3. STATEMENT OF POLICY

This policy establishes a comprehensive framework for managing investor relations, emphasising transparency, compliance, and proactive engagement with two-way communication. It ensures that information is accurate at the time of dissemination and made available to all stakeholders in a timely manner to build and maintain trust and integrity in all investment interactions.

3.1 Material Information

Material information is any information about the Company, as defined in the Bursa Securities' MMLR, which is expected to have a material effect on:

- 3.1.1 Market price or value of the Company's securities, or activity in the trading of its securities; or
- 3.1.2 Decision to buy, sell or continue holding the Company's securities, which is made by an existing holder of those securities or someone considering an investment in those securities.

The Company shall fully comply with its disclosure obligations expressed in the Bursa Securities' MMLR.

3.2 Announcing Material Information

The Company adopts the following process for announcement of material information:

- 3.2.1 Approval from the Board or Managing Director/Group Chief Executive Officer ("MD/GCEO") prior to releasing material information to Bursa Securities.
- 3.2.2 Where possible, announcements are to be made to Bursa Securities on the same day after market closure.
- 3.2.3 Company may issue press releases to all major newspapers and/or newswire services in Malaysia upon approval from the MD/GCEO.
- 3.2.4 Company may organise press conference or briefing/presentation to investors, analysts and fund managers.
- 3.2.5 The Company's announcement to Bursa Securities, press release, media clipping, and any presentation material shall be posted on the Company's website.

3.3 Communication with Stakeholders

- 3.3.1 The Company is committed to treating all shareholders fairly and equitably and keeping all its shareholders and other stakeholders informed of its corporate activities, including changes in the Company or its business which would be likely to materially affect the price or value of its shares, on a timely basis.

3.3.2 Authorised Spokesperson

The Company shall ensure that selected and authorised persons may communicate pertaining to the Company.

- i) The primary spokesperson, who is the MD/GCEO, may communicate with all audiences and provide information and data analysis, as well as respond to questions concerning all aspects of the Company's operations and financial condition, prospects, strategies, governance, management, products, and services.
- ii) The Director of IRSC is the secondary spokesperson.
- iii) The MD/GCEO has the authority to delegate these responsibilities to the Deputy Chief Executive Officers ("DCEOs"), and the Chief Sustainability Office ("CSO").
- iv) 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.

3.3.3 The Company's stakeholders derive from two main audiences, which comprise of;

i) Internal Audience

KPS Berhad and its subsidiary companies' Board of Directors and employees.

ii) External Audience

The Company recognises the external audiences of "shareholders, stakeholders and the public generally" to include:

- Shareholders and prospective investors;
- Analysts, fund managers, brokers and investment bankers;
- Financial agencies and the media;
- Government and regulators;

- Banks and creditors;
- Public listed companies and intermediaries;
- Business partners and service providers;
- Other organisations and special interest groups

3.3.4 Engagement with Substantial Shareholders and Investment Community

i) Substantial Shareholders' Meetings

The Company shall facilitate opportunities for major shareholders to participate effectively in meetings or corporate briefings and to put forth any questions they may have on the motions to be discussed upon. Such corporate presentations are made to provide and assist for a better understanding of the Company's business achievements, strategies, and future directions.

ii) Analysts and Investment Community Meetings

The Company will conduct briefings/one-on-one meetings or group meetings with analysts and the investment community as needed to help them gain a broader understanding of KPS Berhad's business and operational fundamentals.

The Company shall not influence the views or recommendations of analysts, brokerage firms and investment banks but may review an analyst's report for factual accuracy of information that is within the public domain.

3.3.5 Annual General Meeting

The Company shall ensure that resolutions, financial performance, development, strategy, and operational matters of interest to shareholders are updated at the Annual General Meeting ("AGM").

In line with the Company's commitment to equality of access to information, minutes and presentation materials from the AGM shall be posted on the Company's website.

3.3.6 Press Conferences & Briefings

The Company may hold a press conference or media briefing following the AGM or in conjunction with any major corporate announcements or developments.

3.4 Statutory Reports

The Company shall ensure that all relevant information is reported in statutory reports such as the Integrated Annual Report, Sustainability Report, and Corporate Governance Report and that they are published and distributed accordingly.

3.5 Confidential Information and Leaks

The Company shall ensure that all information regarding its operations, financial condition and prospects is regarded as material and price-sensitive and shall be treated as confidential unless it is already in the public domain.

- 3.5.1 To protect the confidentiality of information, access to information should be restricted only to selected employees or third parties who have a legitimate need for the information consistent with their duties or obligations to the Company.
- 3.5.2 The Company shall ensure that in the event material information is provided to third parties, the Company shall require the execution of non-disclosure and confidentiality agreements by these persons.
- 3.5.3 Employees are discouraged from participating in any electronic forum for the exchange of information and comment where there is any discussion on the Company's affairs, particularly related to material information.
- 3.5.4 In the event of information leakage or accidental disclosure of unpublished material information, the situation will be addressed by the Company's MD/GCEO or the Director of the IRSC department. If deemed necessary, the Company shall make an appropriate announcement to Bursa Securities as soon as possible, which may be followed by a press release.

3.6 Reports and Rumours

- 3.6.1 The Company shall not endorse any analyst's report nor influence their opinion or conclusions. However, the Company may circulate analyst reports internally to its Board and senior management as feedback or information on the market and outsiders' understanding and view of the Company.
- 3.6.2 With regards to responding to financial models or drafts of analysts' research reports, it is the Company's policy to only review for factual, publicly available content. Equal emphasis shall be given to correcting erroneous positive or negative information.
- 3.6.3 The Company shall offer guidance to the analysts who request information by indicating factual errors or assumptions that are inconsistent with announced information.

3.6.4 In most cases, the Company shall not react to rumours unless they contain material errors or speculations that may result in unusual market activities.

3.7 Forward-Looking Information and Comment

Any forward-looking information or comment issued by the Company shall be clearly qualified by a disclaimer. The forward-looking statements are subject to certain risks and uncertainties that could adversely affect the actual results. As such, no assurance can be given that the forward-looking statement will prove to have been correct and remain reliable.

3.8 Major Corporate Developments

Major corporate exercises, such as mergers or acquisitions or launches of significant new businesses or products, may attract special attention.

The Company shall strictly enforce its procedures for the protection of confidentiality until all requisite internal approvals have been received for any disclosure or publications exercise is made in line with the provisions of this IR Policy and Bursa Securities' MMLR.

3.9 Insiders

3.9.1 The Company strictly prohibits its staff or directors who have access to material information to deal or to pass on the information to help another person deal in the Company's securities.

3.9.2 The relevant provisions of the Capital Markets and Services Act 2007 apply to all Insiders.

3.9.3 An insider is anyone who has access to material information about the Company, its financial condition, and its operations. Material information that is in the possession of an insider and has not been disclosed to Bursa Securities and the investing public is inside information. Insiders may not deal in the Company's securities while in possession of inside information nor pass on that information to help another person deal in the Company's securities.

3.9.4 Persons who are insiders but who are not Directors or members of the Company's staff are covered by the confidentiality provisions stated in section 3.5.2 of this Policy.

3.10 Obtaining Feedback

The Company values its investors' and key stakeholders' insights and constructive feedback and shall periodically engage stakeholders to capture external perspectives as part of its continuous improvement process. The engagement may take the form of questionnaires, interviews, or informal conversations with investors, analysts, and major stakeholders. The focus of these engagements is to gather opinions on the Company's corporate governance, strategic initiatives, operational efficiency, and performance metrics.

3.11 The Company Website (www.kps.com.my)

The Company's website is one of its primary communication channels to disseminate information and provides email communication.

Announcements, statutory reports, AGM minutes, press releases, official quarterly/yearly presentation materials by MD to investors, analysts, and other related stakeholders shall be posted on the Company's website.

4. REPORTING AND MONITORING

4.1 Communications Guidelines

The Company shall provide clear, fair and balanced disclosure of pertinent information to its shareholders and the investment community in a timely and effective manner.

4.1.1 Material information shall be released to the public in line with Bursa Securities' MMLR in a transparent, unbiased, and impartial manner.

4.1.2 For the release of material information, all stakeholders shall receive the same facts and information. However, the format may differ depending on the audience.

4.1.3 Information shall be complete, accurate, and compliant with Bursa Securities' MMLR. Any material errors will be immediately rectified and clarified.

4.1.4 Material information shall be released in line with the requirements of Bursa Securities' MMLR unless there is an exceptional legitimate reason for it to be withheld.

4.1.5 Material information shall be made available through broad public dissemination; no stakeholder will be given undisclosed material information in any form.

4.1.6 To the extent possible, all disclosures shall:

- be factual and clear;
- contain sufficient quantitative information to allow investors to evaluate its relative importance to the activities of the Company;
- be balanced and fair;
- avoid over-technical language; and
- explain the consequences or effects of the information on the Company's prospects.

4.2 Medium of Communication

The company shall ensure that only approved modes of communication are used concerning the company.

Written and/or oral communications on material information include the following:

- 4.2.1 Reports and documents provided to Bursa Securities and regulatory authorities;
- 4.2.2 Materials and statements in the Company's Integrated Annual Reports, Sustainability Reports, Quarterly Reports, press releases, letters and circulars to shareholders;
- 4.2.3 Presentations or briefings on behalf of the Company;
- 4.2.4 Information on the Company's website;
- 4.2.5 Articles concerning the Company;
- 4.2.6 Correspondence; emails, and other electronic communication platforms;
- 4.2.7 Verbal statements to external parties in formal and informal meetings, press conferences or telephone conversations;
- 4.2.8 Interviews with the mass media;
- 4.2.9 Speeches given on behalf of the Company.

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 in nature.

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