



KUMPULAN PERANGSANG SELANGOR BERHAD

197501002218 (23737-K)

INVESTOR RELATIONS POLICY

VERSION 2/2021

APPROVED BY THE BOARD ON

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<u>CONTENTS</u>	<u>PAGE</u>
1. Introduction	4
2. Objectives of the Policy	5
3. Statement of Policy	6
3.1 Material Information	
3.2 Announcing Material Information	
3.3 Communication with Stakeholders	
3.4 Annual Report and Sustainability Report	
3.5 Confidential Information and Leaks	
3.6 Reports and Rumours	
3.7 Forward-Looking Information and Comment	
3.8 Major Corporate Development	
3.9 Crisis Communications	
3.10 Insiders	
3.11 Obtaining Feedback	
3.12 The Company Website	
4. Reporting and Monitoring	11
4.1 Communications Guidelines	
4.2 Medium of Communication	
4.3 Authorised Spokesperson	
5. Exception	12
6. Appendix	13

1. INTRODUCTION

As a public listed company, Kumpulan Perangsang Selangor Berhad (“KPS” or “the Company”) is committed in 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 continue 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; 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 and its business.

This policy covers disclosures in documents filed with the securities regulators and written statements made in Company's annual and quarterly reports, news releases, letters to shareholders, business presentations, marketing materials, advertisements, and information contained on 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 as well as speeches, press conferences, and conference calls.

1.1 Scope

The IR Policy shall apply to the KPS Board of Directors and employees. The Policy is meant to serve the Company’s shareholders and stakeholders.

1.2 Responsibility

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

1.3 Approving Authority

The BOD of KPS is the approving authority of this Policy document.

1.4 Date of Implementation

The Policy will be implemented immediately after the approval by the BOD is obtained.

1.5 Review Frequency

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

1.6 Reference

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

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 9.16 of Bursa Securities' MMLR – Content of Press or Other Public Announcements.
- v) Paragraph 9.17 of Bursa Securities' MMLR – Preparation of Press or Other Public Announcements

1.7 Definition

The key terms and acronyms that appeared in this document shall be defined as Appendix I.

2. OBJECTIVE OF THE POLICY

KPS strives to maintain its corporate credibility and develop investors' confidence in the Company by practicing 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 intends to keep them informed of material developments and maintaining effective communications with them;
- ii) Provide a framework of processes and procedures upon which the Company can successfully implement its Investor Relations programme.;
- iii) In formulating this Policy, the Company has considered the best practice contained in the Malaysian Code on Corporate Governance, and its disclosure obligations contained in the Bursa Securities Listing Requirements, with which the Company is bound to comply.

2.2 The Company's Investor Relations 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;
- vi) The Company shall strive to communicate with substantial shareholders at least once in each fiscal year to gather feedback on the Company; and
- vii) The Company shall not accept and treat social media as part of official communication channel.

3. STATEMENT OF POLICY

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 MD/GCEO, prior to releasing of 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/media release to all major newspapers and/or newswire services in Malaysia, upon approval from the MD/GCEO.

- 3.2.4 Otherwise, the mass media will refer to Bursa Securities announcements or Company's website for the material information.
- 3.2.5 Company may organise press conference or briefing/presentation to investors, analysts and fund managers.
- 3.2.6 The Company's announcement to Bursa Securities, press release, media clipping, and any presentation material are posted on the Company's website.

3.3 Communication with Stakeholders

3.3.1 The Company is committed to treat all shareholders fairly and equitably, and keep 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 The Company's stakeholders derive from two main audiences which comprises of;

i) Internal Audience

KPS 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 media;
- Government and Regulators;
- Banks and Creditors;
- Public Listed Companies and intermediaries;
- Business partners and service providers;
- Other organisations and special interest groups

3.3.3 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 Presentations

On annual basis, the Company shall conduct at least one briefing to analysts and investment community for the purpose of helping them to gain a broader understanding of the Company's businesses and operating 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.

3.3.4 Annual General Meeting

The Company shall ensure that resolutions, financial performance, development, strategy, operational matters of interest to shareholders are updated in the Annual General Meeting.

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

3.3.5 Press Conferences & Briefings

The Company shall ensure that press conference or media briefing be conducted after the AGM or any announcement or launching of major corporate events or developments.

The Chairman of the Company and the Primary Spokesperson will conduct the press conference/briefing, with the assistance from Secondary Spokespersons, where necessary.

3.4 Annual Report and Sustainability Report

The Company shall ensure all relevant information will be reported in the Annual Report and that it shall be published and distributed in both printed and electronic form.

3.5 Confidential Information and Leaks

The Company shall ensure that all information regarding the Company's operations, financial condition and prospect 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 an information leakage or accidental disclosure of unpublished material information, the situation will be addressed by the Company's MD/GCEO or Director of 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 about 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 analyst, who request for 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 it contains material information, which may affect the price of the Company's securities or trading activity in those securities.
- 3.6.5 Whenever there is material error in the rumour, the Company shall send an announcement to Bursa Securities to deny or clarify the error with relevant supporting information to minimise speculation and promote an orderly market in its securities.
- 3.6.6 The Company shall ensure its transparency in its operations and has established Whistleblowing Policy as the communication channel to assist in the detection of fraud that might occur within the company. Any breach of Company's policies, practices, procedures or other rules of conduct, improprieties in matters of financial reporting and misuse of Company's information shall be dealt in accordance with the relevant law.

3.7 Forward-Looking Information and Comment

- 3.7.1 Information and comment to assist the investment community in evaluating the Company may be provided in Annual Reports, Quarterly Reports, press releases or briefings.
- 3.7.2 The Company shall not furnish forecast of its future financial results but may provide comments on prospects as well as on the likelihood of achieving any publicised targets.
- 3.7.3 If the Company discovers a significant variation between actual information and forward-looking information, the Company shall issue a clarifying statement to avoid misleading the market.
- 3.7.4 Any forward-looking information or comment issued by the Company shall be clearly qualified by a disclaimer or guidance not to rely on the data. 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.

3.8 Major Corporate Developments

For major corporate exercise, 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 has 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 Crisis Communications

The Company shall treat any serious and potentially damaging event/incident, as a crisis due to disruptions that could have materially and negatively impact on its operations, financial conditions or have a material adverse effect on the price of the Company's securities. The Company has established a Standard Operating Procedure for Crisis Communications.

Whilst the MD/GCEO remains the key spokesperson in crisis communications, the DCEOFCS shall be the alternate spokesperson to represent the Company, make official statements and respond to the media in the event of a crisis. Where need arises to address the technical aspects of the crisis more effectively, the MD/GCEO's capacity as the spokesperson can also be assisted by other subject matter experts.

3.10 Insiders

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

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

3.10.3 Insider is anyone, who has access to material information about the Company, its financial condition, and its operations. Material information which 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.

3.10.4 Persons who are Insiders, but who are not Directors or members of the Company's staff, are covered by the confidentiality provisions.

3.11 Obtaining Feedback

The Company welcomes comment and constructive criticism from investors and major stakeholders. As an on-going process, the Company shall conduct survey from time to time to gauge external opinion, either by way of questionnaires or interviews, or by seeking verbal opinion from contact with investors, analysts, and major stakeholders. External opinion shall be on operational, performance matters, governance, and strategic issues.

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

3.12.1 The Company's website is one of its primary communication channels to disseminate information which also provide email communication.

3.12.2 Announcements, annual report, AGM minutes, press releases, presentation materials for briefings or meetings with investors, analysts, investor relations and the media shall be posted on the 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 and unbiased as well as impartial manner.

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

4.1.3 Information shall be complete and accurate and in compliance 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 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 prospect.

4.2 Medium of Communication

The company shall ensure only approved mode of communication be 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 Regulators;
- 4.2.2 Materials and statements in the Company's Annual 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 and electronic mails;
- 4.2.7 Verbal statements to external parties in formal and informal meetings, press conferences or during telephone conversations;
- 4.2.8 Interviews with the mass media;
- 4.2.9 Speeches given on behalf of the Company.

4.3 Authorised Spokesperson

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

- 4.3.1 The primary spokesperson, who is the MD/GCEO, may communicate with all audience and provide information, 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.
- 4.3.2 The secondary spokespersons, DCEOFCs, DCEOSI, Director of IRSC department or subject matter expert, may only communicate with audience in relation to specific areas of responsibility within the Company, unless they are authorised by the primary spokesperson to undertake a broader scope of communications.
- 4.3.3 No other individuals may act as spokespersons for the Company.

5. EXCEPTION

Any exception to the Policy shall require approval of the BOD unless it is deemed as operational in nature.

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APPENDIX I: DEFINITION

Terms	Definition
Policy	A principle of action adopted and has been agreed officially by the management of KPS detailing the general requirements of the stated frameworks. It will be translated into systems, resources or process to operate the business via supporting documents including guidelines and standard operation procedures.
Guideline	An indication or outline of policy to determine a course of action. It outlines the details and practical aspects of a policy to facilitate structured execution or implementation of process. Guideline provides a set of parameters to guide users to effectively implement the policies that had been agreed and approved.
Procedure	It details steps required to perform an activity within a process to help individual in KPS carry out routine operations in step-by-step instruction. It aims to achieve efficiency, quality output and uniformity of performance, while reducing miscommunication and failure to comply to industry regulations.
Bursa Securities	Bursa Malaysia Securities Berhad
KPS or the Company	Kumpulan Perangsang Selangor Berhad
MD/GCEO	Managing Director/ Group Chief Executive Officer of KPS
DCEOFCS	Deputy Chief Executive Officer (Finance and Corporate Services) of KPS
DCEOSI	Deputy Chief Executive Officer (Strategy and Investments)
IRSC	Investor Relations, Sustainability and Communications
IR Policy	Investor Relations Policy, as described in this document
Group	KPS and its subsidiary companies
Audit Committee	Audit Committee of KPS
Board	Board of Directors of KPS
MMLR	Main Market Listing Requirements
SPI	Strategic Planning and Investment Department
FD	Finance Department