

Ref . No.

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**FARM PRICE HOLDINGS BERHAD**  
[Registration No. 202301019404 (1513326-T)]  
(Incorporated in Malaysia)

# **CORPORATE DISCLOSURE POLICY**

## 1. INTRODUCTION

This Corporate Disclosure Policy (“**Policy**”) of Farm Price Holdings Berhad (“**the Company**”) sets out the requirements for disclosure including the quality of disclosure to provide shareholders and investors with comprehensive, accurate and quality information on a timely basis.

In formulating this Policy, the Company has taken into account the recommendations contained in the Malaysian Code on Corporate Governance and its disclosure obligations contained in the ACE Market Listing Requirements of Bursa Malaysia Securities Berhad (“**Bursa Securities**”) (“**ACE LR**”).

This Policy applies to all Directors, Management, principal officers and employees of the Company and its subsidiaries (“**the Group**”) and those authorised to speak on their behalf.

## 2. OBJECTIVES

The objectives of this Policy are as follows:-

- (a) To ensure that the Board of Directors (“**Board**”), employees, and officers of the Company understand their obligations to preserve the confidentiality of material information;
- (b) To provide guidelines and policies in disseminating corporate information to, and in dealing with shareholder, stakeholders, analysts, media and the investing public;
- (c) To reinforce the Company’s commitment in compliance with legal and regulatory requirements on disclosures; and
- (d) To build good investor relations with the investing public that inspires trust and confidence.

## 3. DESIGNATED PERSONS

The designated persons of the Company are responsible for ensuring compliance, overseeing, and coordinating the disclosure of material information. Generally, however, such designations will be limited to the:

- Chairman of the Board; and
- Managing Director/Executive Director.

The Chairman of the Board and Managing Director/Executive Director will serve as the primary contact person for the disclosure requirement and will engage other persons as stipulated above as necessary and appropriate to the matter at hand. In his or her absence, other persons can be contacted for matters referred to in this Policy.

## 4. PRINCIPLES OF DISCLOSURE CONTROLS AND PROCEDURES

### 4.1 Immediate Disclosure of Material Information

As a general guideline, material information is any information which is expected to have a material effect on the following:-

- (a) The price, value or market activity of any of the securities of the Company; or
- (b) The decision of a holder of securities or an investor in determining his/her choice of action.

The following guidelines will be followed by the Company to fulfil its obligation to make immediate announcement of material information:-

- (i) For the prescribed events as set out in Rules 9.04 and 9.19 of the ACE LR, the Company will immediately announce the event upon its occurrence;
- (ii) Materiality can be rather subjective and the Company will take the approach of assessing the likely effect of the information on the activities and financial position of the Company or the price and performance of the Company's securities, in addition to whether the circumstances or event are measurable and would trigger the relevant materiality thresholds in the percentage ratio calculations set out in the ACE LR.

#### **4.2 Withholding of Material Information and Maintaining Confidentiality**

Material information may be kept confidential temporarily if the immediate disclosure would prejudice the ability of the Company to pursue its corporate objectives and in exceptional cases, as set out in the ACE LR. In such cases, the Company must ensure that the material information will be kept confidential to prevent leakage. The Company should ensure strictest confidentiality is maintained by limiting the number of people with access to or in possession of the material information and ensure that all confidential documents are being protected and secure.

The Company will monitor its market activity and rumours or news reports concerning the information (if any). If confidentiality of information is lost or cannot be maintained, the Company shall immediately announce the information to Bursa Securities.

#### **4.3 Procedures for Disclosure of Material Information**

All announcements to Bursa Securities will be prepared and/or reviewed by the Company Secretary, or the appointed merchant bank in accordance with the applicable securities law and ACE LR and all announcements shall then be approved by the Chairman of the Board/ Managing Director/ Executive Director or other officer(s)/representative of the Company duly authorised ("**Authorised Persons**").

The Chief Financial Officer/ Senior Finance Manager will review and validate all financial data contained in the announcement to ensure that disclosures are consistent with the prevailing accounting standards and guidelines.

The Company Secretary or the appointed merchant bank shall release the announcement to Bursa Securities once the announcement is approved by any one (1) of the Authorised Persons.

#### **4.4 Clarification, Confirmation or Denial of Rumours or Reports**

Whenever the Company becomes aware of any rumour or report, the Company should enquire whether it is true or false or contains any material information and make immediate disclosure to clarify, confirm or deny the rumour or report. The disclosure can be in any form including that by word-of-mouth and not limited to an article or otherwise publish the disclosure in the media. The Company, however, is not expected to respond to or clarify articles or reports if it considers the published information to be general in nature.

#### **4.5 Unusual Market Activity ("UMA")**

Where there is unusual price movement and or unusual trading activity in the shares of the Company, the Company must immediately undertake a due enquiry with the relevant persons such as its Directors, major shareholders and persons familiar with the affairs of the Company to seek the cause of the unusual market activity and make the necessary announcement to the Bursa Securities.

If the Company is unable to determine the cause of the UMA, the Company will announce that there have been no undisclosed developments which would account for UMA.

#### **4.6 Unwarranted Promotional Disclosure Activity**

The Company must not engage in any promotional disclosure activity in any form which may mislead the investors or cause unusual price movement and trading activity in the securities of the Company. Such activities include news release, public announcements, predictions, reports or advertisements, which are unjustifiable, exaggerated, flamboyant, overstated or over-zealous.

#### **4.7 Insider Trading**

All Directors, Management, principal officers and employees of the Company are prohibited from trading in the Company's shares at any time they are in possession of any undisclosed material information.

#### **4.8 Equal Access to Material Information**

The Company must disclose to the public all material information necessary for informed investing and take reasonable steps to ensure that all investors who invested in the securities of the Company enjoy equal access to this information. The Company must ensure that no disclosure of material information is to be made on an individual or selective basis unless such information has previously been fully disclosed or disseminated to the public. The Company must immediately announce to Bursa Securities any non-public material information which has been inadvertently disclosed when responding to questions or when commenting on draft reports from journalists, analysts or fund managers.

#### **4.9 Corporate Website**

The Company must have its corporate website where the website must publish all announcements made pursuant to the ACE LR as soon as the announcements are released to the Bursa Securities' website. The Company must ensure that its website is regularly updated with current information and contained information to enhance investor relations which include the email address, name of designated persons and their contact numbers to enable the queries from the public be forwarded to the Company.

#### **4.10 Periodic Disclosures**

##### **4.10.1 Quarterly Report**

An interim financial report that is prepared on a quarterly basis ("**quarterly report**") must be announced to the Bursa Securities as soon as the figures are approved by the Board and in any event not later than two (2) months after the end of each quarter of a financial year. The quarterly report must include the information as stipulated in the ACE LR.

##### **4.10.2 Issue of Annual Audited Financial Statements and Annual Report**

The Company must issue its annual report that includes the annual audited financial statements on a consolidated basis together with the auditors' and Directors' reports of the Company and forward them to Bursa Securities and shareholders not later than four (4) months from the close of the financial year end of the Company. The annual audited financial statements together with the auditors' and Directors' reports must be announced to Bursa Securities not later than four (4) months from the close of the financial year end of the Company.

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**5. REVIEW OF THIS POLICY**

This Policy shall be regularly reviewed by the Board to ensure compliance to the ACE LR and other regulatory requirements, as and when required and communicate the new changes to all relevant parties.

**6. EFFECTIVE DATE**

This Policy is effective on 30 June 2023.

History:-

<b>Document No.</b>	<b>Version No.</b>	<b>Board's Approval Date</b>	<b>Effective Date</b>
FP-011	1.0	30 June 2023	30 June 2023

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