

CORPORATE DISCLOSURE POLICY (“CDP”)

1. Introduction

The RGT Berhad (“RGTBHD” and the “Company”) has formulated this policy in accordance with Malaysian Code on Corporate Governance and the disclosure obligations contained in the Main Market Listing Requirement of Bursa Malaysia Securities Berhad (“Bursa Securities”) (“MMLR”). This policy applies to the Board of Directors (“BOD”) and all employees of the company.

2. Objectives

The objectives of the CDP are as follows: -

- i) To maintain awareness and provide guidance to the BOD and employees of RGTBHD and its subsidiaries on the Company’s disclosure requirements and procedures;
- ii) To establish policies and guidelines in disseminating information to, and interacting with shareholders, financial analysts, media, regulators, the investing community and other stakeholders;
- iii) To ensure compliance with all relevant legal and regulatory requirements for material information disclosure; and
- iv) To establish trust and confidence by cultivating solid relationships with the investment community.

3. Scope and Applicability

This Policy governs with how RGTBHD and its employees handle with material non-public information. It applies to all directors, officers and employees of RGTBHD and its operating subsidiaries (collectively, the “Employees”) and insiders (as defined in the MMLR).

It comprises all of the methods that RGTBHD uses to interact with the public, such as:

- i) Documents filed with security authorities, written statements made in the Company’s annual report and quarterly reports, media and earnings releases, Chairman statement, management addresses at industry conferences and information on the Company’s website; and
- ii) Oral statements made in group and individual meetings or telephone conversations with analysts and investors, interviews with the media and press conferences.

This disclosure policy does not apply to communications in the ordinary course of business not involving material information.

4. Material Information

Material information is defined as any information regarding the Company that may reasonably be anticipated to have a material impact on:

- i) Price, value or market activity of any of its securities; or
- ii) Investors’ decision in determining his course of action

In relation to any material information that is being withheld temporarily, RGTBHD is committed to ensuring the strictest confidentiality is maintained, including limiting the number of persons having access to the material information and ensuring security of all confidential documents. The following are a few examples of documents or communications that would most likely contain Material Information:

- i) Reports, responses and documents provided to the Bursa Securities and other authorities;
- ii) Meeting materials and statements in the Company’s Annual Reports, quarterly reports, press releases and circulars to shareholders; and presentations on behalf of the Company.

Materiality can sometimes be very subjective. In such circumstances, the Company will in its best endeavours attempt to assess materiality on a case-to-case basis either through evaluation the likely consequences of the information in relation to the price, financial position and performance of the Company’s securities or vide the percentage ratio calculation method as set out in the MMLR.

5. Target Audience

The Company recognise the following audience to which information, which may or may not be material in nature, may be disseminated towards: -

- i) Shareholders, stakeholders and prospective investors;
- ii) Analysts, fund managers and investment bankers; and
- iii) The financial press and other media.

6. Communication Commitments

The Company will adopt the following qualities in its communications to the best of its ability:

- i) **Transparent:** material information will be released, whether it is favourable or not, in a balanced and fair manner that is not misleading.
- ii) **Consistent:** all stakeholders will receive the same information; only formats may differ depending on audience and forum.
- iii) **Accurate:** information should be complete and accurate when released and any material errors or omissions will be immediately corrected and clarified.
- iv) **Non-selective:** equality of access to material information will be achieved through broad public dissemination; no stakeholder will be given undisclosed material information in any form.
- v) **Timely:** material information will be released as soon as it is known, unless there are exceptional, legitimate reasons to withhold, in which case material information will not be withheld longer than absolutely necessary and the strictest confidentiality must be maintained until the material information is released.

7. Authorised Spokespersons

The Company shall elect the Chairman and Chief Executive Officer (“CEO”) as the spokesperson to be responsible for the oversight and coordination of the disclosure of material information to the markets. The duties of the spokesperson shall include:

- i) creating awareness amongst the directors, management and employees of RGTBHD on the importance of timely disclosures;
- ii) review the material for disclosure to ensure adherence to regulatory requirements;
- iii) ensures that the material is duly verified by the BOD/CEO;
- iv) ensures the information is disclosed in a timely manner as prescribed by regulations;
- v) maintain accurate records pertaining to all disclosures made; and
- vi) is constantly updated on developing material information in relation to RGTBHD.

The extend of autonomy for the designated spokesperson is a matter for deliberation of the Board as a whole.

8. Disclosure Obligations and procedures

The Company must make immediate public disclosure of any material information except the extraordinary circumstances, the Company may temporarily refrain from publicly disclosing material information, provided that complete confidentiality is preserved. Where material information is withheld, the Company must refrain from delaying disclosure for an excessive amount of time since confidentiality is unlikely to be preserved for more than a short length of time.

The Procedures as follows: -

- i) The CEO or Chief Financial Officer shall review and validate the information contained in the announcement.
- ii) Majority members of the BOD is required to endorse or approve each announcement prior to its release to Bursa Securities.
- iii) The Company Secretary or the external adviser authorised by the Company shall prepare and release the announcement to Bursa Securities.

9. Confidentiality Obligations & Leaks

All information about the Company, its operations, financial position and future prospects, should be regarded as material and price-sensitive, and must be treated as confidential unless it is already in the public domain.

To maintain information confidentially, access to information should be restricted only to those individuals (employees, or third parties) who have a legitimate need for the information in accordance with their duties or obligations to the Company.

Third Parties: In certain circumstances, the Company may provide material information to third parties that is not in the public domain. For example, the Company's auditors, company secretary, bankers, lawyers or other professional advisors may require such information to execute their duties. Unless there are adequate existing legal protections that satisfy the Company, the Company will require the execution of non-disclosure and confidentiality agreements by these persons.

Information Leakage & Unintentional Exposure: In the event of an information leakage or the accidental disclosure material information that has not been publish, the matters will be addressed in line with the Company's chain of authority and responsibility. If deemed necessary, the Company will make an appropriate announcement to the Exchange as soon as practicably possible, which may be followed by a press release and/or other communication modes.

10. Reports and Rumours

The Company recognises the important role performed by research analysts in assisting the establishment of an efficient market. Notwithstanding the above, the Company will not endorse any analyst's report, nor will endeavour to influence the opinions or conclusions of the analyst.

Whenever the Company becomes aware of a rumour or report (whether is true or false) that contains material information, the Company shall make due inquiry and immediately clarify, confirm or deny the rumour or report publicly via announcement with sufficient facts to support the clarifications, confirmation or denial. The CEO shall make due enquiry before publicly clarify, confirm or deny the report or the rumour. After the endorsement of the Board, the Company shall submit its response to Bursa Securities via the Bursa Link.

11. Unusual Market Activity ("UMA")

When unusual trading activity, price movement, or both occur, the Company will immediately conduct an investigation to determine the cause of the UMA. If the UMA was resulted from the announcement of material information disclosed publicly vide Bursa, no further announcement will be made by the Company. However, if the UMA indicates a misinterpretation of material information or a leak of undisclosed information, or if the company unable to determine the cause of UMA, the Company shall take appropriate measures to inform the BOD with all relevant facts for clarification of UMA, and then make necessary announcement to Bursa Securities in relation to the UMA.

12. Unwarranted Promotional Disclosure Activity

The Company shall not participate in any promotional disclosure activity which may have misled investors or cause unwarranted price movement and trading activity in the Company's securities. Such activity includes news release, public announcements, predictions, reports or advertisement, which are unjustifiable, exaggerated, flamboyant, overstated or over-zealous.

13. Principal officers and Insider

Anyone who has access to material information of the Company, its financial condition and its operations which is not generally available, is regarded as an Insider. The Company recognises its principal officers as Insiders. Material information which is in the possession of an Insider and has not been disclosed to the Bursa Securities and the investing public is Inside Information (including each of the BOD' and Board Committees' meeting materials). Insiders may not to deal in the Company's securities while in possession of Inside Information, and shall not pass that information to aid another person deal in the Company's securities.

The Company affirms its awareness of the provisions of Section 188 of the Capital Markets and Services Act 2007 (Amended 2010) in regards to insider trading. Directors, Management and employees of the Company and its subsidiaries shall not trade on the basis of any material information that has not been disclosed to the public. The list of all Insiders will be reviewed by the Management from time to time when deemed necessary.

14. Closed Period

Closed period is defined as a period commencing from 30 calendar days before the targeted date of announcement to Bursa Securities of the Company's quarterly results, up to the date of the announcement of the Company's quarterly results. During closed periods, the directors and principal officers are prohibited from commenting on current period earnings estimates and financial assumptions. Communication must be limited to commenting on publicly available or non-material information.

15. Corporate Website

All the Company's publicly disclosed material information and presentations will be made available at the Company's website. The Chief Financial Officer shall ensure the Company's website be kept up-to-date with the Company's latest disclosures.

16. Press, Conference, Meetings or Interviews with Shareholders, Analysts and Media

The Company may conduct or be invited to press conference, meetings or briefings with shareholders, analysts or media from time to time concerning the Company's performance and developments. The Authorised Spokespersons must exercise care to ensure only information already in public domain is communicated in the meetings or interviews. The CEO or Chief Financial Officer will review all presentations, hand-out materials and speech notes to ensure accuracy and consistency with other public disclosures.

17. Enforcement

This CDP must be made available to all individuals to whom it applies. The Human Resources Department shall endeavour to ensure that all employees are aware of the CDP's existence, relevance and the Company's expectation that employees shall comply with the CDP.

Any officer or employee who breaches this CDP may be subject to disciplinary action, which may include immediate termination from the Company. The violation of this CDP may also violate certain securities laws. If it appears that a director, officer or employee may have violated such securities laws, the Company may report them to the appropriate regulatory authorities, who may impose penalties, fines or imprisonment.

18. Review of Policy

The Policy will be periodically reviewed by the BOD to ensure it remains current and effective in accordance with the Company's practices and in compliance with the new/amended regulations.

In the best practice of corporate governance, this policy will be made available on the Company's website www.rgtberhad.com.