

# CELCOMDIGI

## Corporate Disclosure Policy

*Policy owner:* Chief Corporate Affairs Officer (“**CCAO**”) &  
Chief Financial Officer (“**CFO**”)  
*Policy manager:* Head of Investor Relations  
*Approver:* Board of Directors

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### 1 PURPOSE AND SCOPE

As a public listed company, CelcomDigi (“the **Company**”) and its subsidiaries (“the **Group**”) is committed to disclose to the public all Material Information necessary for informed investing in accordance with the continuing disclosure requirements set out in Bursa Malaysia Securities Berhad (“**Bursa Securities**”) Main Market Listing Requirements (“**MMLR**”). This includes implementing reasonable steps to ensure that all who invest in the Company’s Securities have equal access to such information to avoid selective disclosure.

This policy aims to:

- Set out the corporate disclosure principles that must be complied with to ensure timely and accurate dissemination of Material Information to shareholders, stakeholders, analysts, regulators, and the investing public
- Provide a basis for the processes described in the Corporate Disclosure Manual that is aligned with applicable legal and regulatory requirements on disclosure of Material Information

This policy shall apply to all employees, directors, officers, spokespersons, representatives, advisors, and other ‘authorised recipients’ of the Company and its subsidiaries. The policy owner shall advise on and monitor its implementation.

### 2 GENERAL PRINCIPLES

The Group strives to maintain its corporate credibility and instil investor confidence by practicing a structured approach to the communication of Material Information (as defined herein). This should assist in achieving a fair market value for the Company’s Securities - a benefit to both shareholders and the Group. The investor relations initiatives, which is designed to be both proactive and interactive, will be based on the Group’s commitment to:

- Always report its financial results and material developments to Bursa Securities, its shareholders and other stakeholders in a timely, open and comprehensive manner
- Communicate only through its designated spokespersons
- Proactively address reports and rumours, so as to avoid unnecessary speculation in its Securities
- Give reasonable access to analysts and the media to help them develop informed opinions of the Group, but will not seek to influence those opinions

- Meet with its major shareholders at least once in each fiscal year as part of its ongoing programme to inform, and obtain feedback on the Group
- Use its website as an additional primary communications channel

### 3 SPOKESPERSONS

The Group has a well-defined structure for governance and management which provides specific authority and responsibility for the implementation of this Policy. The designated Primary Spokespersons are:

- Chairman
- Deputy Chairman
- Chief Executive Officer
- Deputy Chief Executive Officer
- Chief Financial Officer

Primary Spokespersons may communicate with all audience constituents, providing information and analysis and responding to questions concerning all aspects of the Group's operations and financial condition, its future prospects and its strategies. They may also discuss matters relating to the Group's governance and management, as well as its products and services, and initiatives.

The Secondary Spokespersons may communicate only in connection with their specific areas of responsibility within the Group, and as authorised by a Primary Spokesperson. Secondary Spokespersons will include personnel from the Investor Relations and Communications functions.

No other individuals may act as spokespersons for the Group, unless authorised.

### 4 CORPORATE DISCLOSURE POLICIES

The Company shall comply with the following corporate disclosure policies as stipulated in **Chapter 9** of the MMLR. The key principles of Chapter 9 are reflected in this section. In case of inconsistency, **Chapter 9** shall prevail.

#### 4.1 Immediate disclosure of Material Information

The Company shall make immediate public disclosure of any Material Information, which may include information that:

- a) Concerns the Company's assets and liabilities, business, financial condition, or prospects
- b) Relates to dealings with employees, suppliers, customers, and others
- c) Relates to any event affecting the present or potential dilution of the rights or interests of the Company's Securities
- d) Relates to any event materially affecting the size of the public holding of the Company's Securities

The Company may, in the following exceptional circumstances, temporarily refrain from

publicly disclosing Material Information, provided that complete confidentiality is maintained:

- a) When immediate disclosure would prejudice the ability of the Company to pursue its corporate objectives
- b) When the facts are in a state of flux and a more appropriate moment for disclosure is imminent
- c) Where the laws prohibit the disclosure of such information

Where Material Information is withheld, the Company shall refrain from delaying disclosure for an unreasonable period of time since it is unlikely that confidentiality can be maintained beyond a short period of time.

The guidelines and disclosure process for Material Information are further set out in the Corporate Disclosure Manual and Financial Information Disclosure Manual.

#### **4.2 Thorough public dissemination**

The Company shall release Material Information to the public in a manner designed to obtain the fullest possible public dissemination. The Company shall ensure that no disclosure of Material Information is made on a selective basis to shareholders (except for permitted recipients), analysts, journalists, or other persons unless such information has previously been fully disclosed and disseminated to the public.

If Material Information is inadvertently disclosed at any meetings with shareholders, analysts, journalists, or others, it shall be publicly disseminated as promptly as possible.

#### **4.3 Clarification, confirmation or denial of rumours or reports**

Whenever the Company becomes aware of any rumour or report, true or false, that contains Material Information (i.e., circulated by any means including by word-of-mouth, an article published in a newspaper, newswire, magazine, a broker's market report or any other publication), it shall make due enquiry and immediately publicly clarify, confirm, or deny the rumour or report via Bursa Securities.

#### **4.4 Response to unusual market activity**

Where unusual price movement, trading activity, or both (unusual market activity) occurs, the Company shall as promptly as possible undertake an enquiry to seek the cause of the unusual market activity in its Securities.

The Company shall consider whether there is any information which would account for the unusual market activity that:

- a) Has recently been publicly disclosed
- b) Has not been publicly disclosed (in which case the unusual market activity may signify that a 'leak' has occurred)
- c) Is the subject matter of a rumour or report

#### **4.5 Unwarranted promotional disclosure activity**

The Company shall refrain from any form of promotional disclosure activity which may mislead investors or cause unwarranted price movement and activity in the Company's Securities. These include news releases, public announcements, predictions, reports, or advertisements

which are exaggerated, flamboyant, overstated, over-zealous, and not justified by actual developments concerning the Group.

#### 4.6 Insider trading

A person is deemed an 'Insider' if he / she possess information that is not generally available (or that he / she know or ought reasonably to have known is not generally available), but which, on becoming generally available, a reasonable person would expect it to have a material effect on the price or value of Securities.

Insiders must **NOT** trade on the basis of Material Information which is not known to the public. The handling of price-sensitive insider information is governed by the Insider Manual.

Guidelines and governance requirements on insider trading are set out in the Insider Manual.

## 5 REFERENCE DOCUMENTS

### Manuals

- Corporate Disclosure Manual
- Financial Information Disclosure Manual
- Insider Manual

## DEFINITIONS

Material Information: Material Information is any information about the Group which might reasonably be expected to have a material effect on:

- The market price or value of the Company's Securities, or activity in the trading of its Securities; or
- A 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.

Securities: Refers to shares, debentures, stocks, bonds, notes, units in a unit trust scheme or other prescribed investments, and any right, option, interest in respect thereof.