



## **T7GB CORPORATE DISCLOSURE POLICIES AND PROCEDURES**

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### **CORPORATE DISCLOSURE POLICIES AND PROCEDURES**

#### **1. PURPOSE**

T7 Global Berhad (“**T7 Global**” or “**the Company**”) is committed to provide accurate, clear, timely and complete disclosure of material information pertaining to the Company’s performance and operations to shareholders, investors and the public generally.

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

The CDPP shall also apply where consent is required from the Company in relation to public announcements made by the Company’s contractors and subcontractors with regards to contracts awarded to them.

#### **2. OBJECTIVES**

The key objectives of the CDPP are as follows:-

- a) To raise awareness and provide guidance to the Directors, Management and employees of the Company on the disclosure requirements and practices and to ensure consistency, accuracy and completeness of the disclosure practices throughout the Group;
- b) To provide guidelines and policies in disseminating corporate information to, and in dealing with shareholders, stakeholders, analysts, media and the investing public;
- c) To ensure compliance with all applicable legal and regulatory requirements on disclosure of material information; and
- d) To build good investor relations with the investing public that inspires trust and confidence.



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### 3. INTERNAL STRUCTURE AND SYSTEM FOR CORPORATE DISCLOSURE

The Board is ultimately responsible for ensuring that the CDPP is implemented and the disclosure requirements are fulfilled.

The Board delegates the implementation of the CDPP to the Management Committee of the Company which consists of:-

#### (i) **Corporate Disclosure Committee ("CDC")**

- a) The CDC consists of the Chairman and Executive Directors.
- b) The CDC has been established to oversee all matters relating to the Company's corporate disclosure practices and to ensure adherence to the Corporate Disclosure Policy.
- c) The functions and responsibilities of the CDC include:-
  - To maintain an awareness and understanding of the disclosure's rules and guidelines;
  - To ascertain whether corporate developments, transactions and other events constitute material information and if so, ensuring the procedures outlined in the Disclosure Policy are fully adhered to;
  - To implement and monitor compliance with the CDPP and to undertake reviews of any violations, including assessment and implementation of appropriate consequences and remedial actions; and
  - To reviewing and update the CDPP from time to time to ensure compliance with the Listing Requirements and other regulatory requirements.

#### (ii) **Authorised Spokesperson**

- a) Primary Spokesperson
  - Chairman; and
  - Executive Directors.

The Company's Chairman and Executive Directors have been appointed to communicate with audience constituents and respond to questions in relation to the corporate vision, strategies, developments, future prospects, financial plans and operation matters.



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b) Secondary Spokesperson

- Chief Operating Officer
- Chief Financial Officer
- Senior Manager of Corporate Affairs

The Chief Operating Officer, Chief Financial Officer and Senior Manager of Corporate Affairs may only communicate to audience constituents on information already in the public domain, unless they are authorised by the Primary Spokespersons to undertake broader communications.

#### 4. PROCEDURES AND PRACTICES ON CORPORATE DISCLOSURE

(i) **Material Information**

a) Material information, in accordance with Paragraph 9.03(2) of Listing Requirements, constitutes information about the Company and its subsidiaries which are reasonably expected to have a material effect on the following:

- The market price, value or market activity of the Company's securities; and
- The decision of a holder of securities or an investor in determining his choice of action.

Material information comprises any or a combination of the following:-

- Concern the Company's assets and liabilities, business, financial condition or prospects;
- Relates to dealing with employees, suppliers, customers and others;
- Relates to any event affecting the present or potential dilution of the rights or interests of the listed issuer's securities; or
- Relates to any event materially affecting the size of the public holding of its securities.



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- b) The guidelines which the Company will follow to fulfil its obligation to make immediate announcement of material information:-
- For the prescribed events which may require immediate disclosure as set out in Paragraph 9.04 of the Listing Requirements;
  - Materiality can be very subjective and the Company will take the approach of assessing the likely effect of the information on the price scope of activities and financial position or performance of the Company's securities, in addition to whether the circumstances or event are measurable and trigger the materiality thresholds in the percentage ratio calculation method set out in the Listing Requirements.

### **(ii) Withholding Confidential Information and Maintaining confidentiality**

- a) The Company will withhold material information from the public for legitimate business purposes provided by Paragraph 9.05(3) of Listing Requirements

These include:

- When immediate disclosure would prejudice the ability of the Company to pursue its corporate objectives;
  - When the facts are in a state of flux and a more appropriate moment for disclosure is imminent; and
  - Where the company or securities laws restrict such disclosure.
- b) If the material information is being withhold, pursuant to Paragraph 9.06 of Listing Requirements, the Company must ensure that the strictest confidentiality is maintained by limiting the number of people with access to the material information and ensuring the security of all confidential documents.

In the event that material information is or is believed to have been inadvertently disclosed to third parties or where the material information has become generally available through the media or otherwise, the Company must immediately announce the information to Bursa Malaysia Securities.



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### 5. LEAKAGES OF MATERIAL INFORMATION

In the event of leakage of material information, the Company will take appropriate action to make an immediate announcement of the material information to Bursa Malaysia Securities.

### 6. CLARIFICATION, CONFIRMATION OR DENIAL OF RUMOURS OR REPORTS

Generally, the Company should not entertain market rumours unless there is significant reaction in the market for the Company's listed securities or the Company is of the view that a corresponding response to such rumours would be beneficial to the Company. The Board shall have the discretion to consider whether the Company should respond to such market rumours.

In the case where a rumour or report which has been circulated contain erroneous material information which the Company is aware of, the Company shall immediately announce to Bursa Malaysia Securities a denial or clarification of the rumour or report by providing facts sufficient to support the denial or clarification of any misleading aspects of the rumour or report.

### 7. RESPONSE TO UNUSUAL MARKET ACTIVITY

Where unusual price movement, trading activity, or both ("**unusual market activity**") occurs, the Company shall immediately undertake due enquiry regardless of whether an unusual market activity query is issued by Bursa Malaysia Securities. Thereafter, a clarifying announcement shall be issued on an immediate basis.

### 8. PROCEDURES FOR DISCLOSURE OF MATERIAL INFORMATION

- a) The CDC will manage all of the Company's releases of announcements of material information to Bursa Malaysia Securities through the Company Secretary or the appointed merchant bank in accordance with the applicable securities law and Listing Requirements and the announcement shall then be approved by the Executive Directors before release to Bursa Malaysia Securities.
- b) The Chief Financial Officer, Legal Affairs and the relevant departments will review and verify the accuracy of all financial data and all information contained in the announcement to ensure that disclosures are consistent with the prevailing accounting standard and guidelines.



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### 9. INSIDER TRADING

- a) Anyone who has access to material information of the Company, its financial condition and its operations, is regarded as an insider. Material information which is in the possession of an insider and has not been disclosed to the investing public is insider information.
- b) Insiders may not deal in the Company's securities while in possession of insider information, nor may they pass on that information to help another person deal in the Company's securities.
- c) The relevant provisions of the Capital Markets and Services Act 2007 apply to all Insiders.
- d) The Company Secretary will advise the Directors and principal officers on the trading restrictions in the Company's securities in accordance with the provisions of the Listing Requirements.

### 10. CONSENTS REQUIRED BY CONTRACTORS FOR PUBLIC ANNOUNCEMENTS

The Company shall ensure that its subsidiaries and associated companies include a confidentiality clause in all contracts awarded to contractors as follows:

*"The contractor shall obtain written approval from the Company prior to disclosing or making any public statements or announcements, by way of press or other media, regarding this contract."*

The procedures in relation to the consent required by contractors for public announcements are as follows:

- a) The contractor shall write an official email to the project manager or person in charge of the respective project / contract, requesting consent from the Company for the public announcement. The email shall contain details such as the draft announcement, contact person, reasons for the public announcement and intended date of announcement.
- b) Upon receiving such request, the project manager or person in charge shall notify the Corporate Affairs Department of the Company immediately or within a 24 hour period.



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- c) The Corporate Affairs Department shall then seek approval from the CDC and notify the senior management of the Company of such request as follows:

### Members of CDC

- Acting Executive Chairman : Datuk Seri Nik Norzrul Thani Bin Nik Hassan Thani
- Deputy Executive Chairman : Tan Sri Datuk Seri Tan Kean Soon
- Executive Director : Tan Kay Vin

### Senior Management of the Company

- Group Chief Operating Officer : Tan Kay Zhuin
- Group Chief Financial Officer : Ong Fee Peng
- SVP, Group Support Services : Puan Sri Shirley Law Siong Hiong
- Legal Affairs : Ian Shang Kuan

- d) Any member of the CDC may approve such request.
- e) After the request is approved by the CDC, the Corporate Affairs Department shall notify the project manager or person in charge.
- f) The contractor shall then send the Company a reference or link to the public announcement for records purposes.

## 11. REVIEW OF THE CDPP

The CDPP has been adopted by the Board and any subsequent amendment to the CDPP can only be approved by the Board.

The CDC will review the CDPP periodically to ensure that it effective in accordance with any new regulations on the disclosure obligations and practices.

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