

## 1. Policy Statements

AIMFLEX Berhad (the “Company”) and its subsidiaries (collectively the “Group”) Investor Relations Policy is intended to assist the Group in fulfilling its obligations to ensure that all information relevant and material to the Group’s shareholders and the market is disclosed in a timely manner, while protecting the Group’s commercially sensitive information.

The aim is to represent the Group fairly and accurately, so that investors and potential investors can make properly informed investment decisions, and others can have a balanced understanding of the Group and its objectives. It is key for every AIMFLEX employee to understand the value of effective communication. Accurate and timely communication with stakeholders is integral to a business’ risk management process.

The Company adheres to the following 6 specific corporate disclosure policies which are in accordance with Rule 9.02 of Bursa Malaysia Securities Berhad (“Bursa Malaysia”)’s Listing Requirements:

- (a) Immediate disclosure of material information;
- (b) Thorough public dissemination;
- (c) Clarification, confirmation or denial of rumours or reports;
- (d) Response to unusual market activity;
- (e) Unwarranted promotional disclosure activity; and
- (f) Insider trading.

## 2. Scope

This Policy extends to all employees and officers of the Group, their respective Boards of Directors, those authorised to speak on its behalf, and all other insiders. It covers disclosure in:

- i. continuous disclosure documents filed with securities regulators, including financial and non-financial documents, including annual information forms, proxy materials, management’s discussion and analysis (“MD&A”) and written statements made in the Company’s annual and quarterly reports;
- ii. technical reports related to or with respect to the Group’s material properties;
- iii. documents issued in connection with an offering of the Group Company’s securities;
- iv. press releases and material change reports;
- v. articles concerning the Company;
- vi. letters to shareholders;
- vii. presentations by senior management and other employees; and
- viii. the Company’s website and other electronic communications

Nevertheless, it also extends to oral statements made in:

- i. meetings;
- ii. telephone conversations with analysts, investors and potential investors;
- iii. interviews with the media;
- iv. speeches;
- v. press conferences;
- vi. investor presentations; and
- vii. conference calls.

### 3. Communications Commitments

AIMFLEX will make every effort to ensure all material information concerning the Group is made as freely and widely available as possible. The Group encourages an exchange of opinion between itself and its principal stakeholders including investors, employees, customers and suppliers, and will organise its communications to facilitate that dialogue.

The characteristics below shall apply to the Group communications:

- i. **Transparency:** AIMFLEX is committed to provide the public with clear, accurate and reliable information at all times. We seek to establish close relationships with our stakeholders, both internal and external, through regular communication, integrity and transparency.
- ii. **Consistent:** All stakeholders will receive the same information; only formats may be 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. **Prompt disclosure:** AIMFLEX recognises the value of communicating company-related information in a timely manner. Publicly available information on company related matters should be released to all internal & external stakeholders and to the public simultaneously.
- v. **Coherent:** Information shall be presented in a clear, factually accurate manner, avoiding ambiguity, jargon, legal and technical terms where possible.

#### **4. Designated Spokespersons**

Communication with stakeholders, media and financial markets must be aligned with the Company's official stance and strategy and must only be done by duly authorised Company Spokespersons. Any person who is not authorised to represent the Group must decline to comment. Disciplinary action will be taken to any employee who does not comply with this rule.

#### **5. Material Information**

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

- a) the market price or value of the Company's securities, or activity in the trading of its securities; or
- b) 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; or
- c) the anticipated impact of the information on the Group's entire scope of activities; or
- d) the anticipated impact of the information on the Group's financial performance.

For the purpose of this Policy, material information should follow the guidelines and interpretation of applicable rules and regulation of Bursa Malaysia Securities Berhad's Listing Requirements.

Materiality can be difficult to evaluate on occasion, however. The Company will always lean towards an assessment of the likely effect of the information on the price of the Company's securities, rather than a determination of whether the circumstances or events are measurable and trigger the materiality thresholds in the Exchange's methods for percentage ratio calculation.

#### **6. Confidentiality**

All AIMFLEX documentation, correspondence and company-related information, unless and until publicly available must be treated as material and confidential. Non-public information from or concerning suppliers, customers, employees, agents, consultants and other parties must also be protected in accordance with legal and contractual requirements.

(For the benefit of employee, reference should be made to the Code of Conduct, Insider Trading Policy and Letter of Employment as guidelines to help protect confidentiality and prevent leakage or misuse of confidential information.)

**7. Immediate Disclosure of Material Information**

Material information will be announced immediately to Bursa Malaysia first and made available at Company's website.

**8. Thorough Public Dissemination**

The Company will ensure releasing material information to the public in a manner designed to obtain its fullest possible public dissemination.

The Company will also ensure that no disclosure of material information is made to selective person or group of persons unless such information has previously been fully disclosed and disseminated to the public.

**9. Clarification, Confirmation or Denial of Rumours or Reports**

Whenever the Company becomes aware of a rumour or report, true or false, that contains material information, the Company must make due enquiry and immediately clarify publicly whether to confirm or deny the rumour or report.

**10. Response to Unusual Market Activity ("UMA")**

Whenever there is UMA of its securities traded, the Company must, upon query from Bursa Malaysia, undertake due enquiry with the relevant persons such as the Directors or major shareholders to determine the cause and issue a clarifying announcement.

**11. Unwarranted Promotional Disclosure Activity**

The Company must refrain from any form of promotional disclosure activity which may mislead investors or cause unwarranted attention and price movement in the securities of the Company.

**12. Insider Trading**

Anyone who has access to material information about the Group, 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 Exchange and the investing public is Inside Information.

Insiders may not deal in the Company's securities while in possession of Inside Information, nor may they pass on that information to help another person deal in the Company's securities.

The Company has published a Code of Conduct and Insider Trading Policy which applies to all members of employee and contains provisions for the proper regulation and control of the trading in the Company's securities by employee Insiders.

**13. Forward-Looking Information**

The Company will not disclose forward-looking information unless it has a reasonable basis for the forward-looking information. Where the Company elects to disclose forward-looking information in continuous disclosure documents, speeches, investor conference calls or otherwise, it shall include with their forward-looking statements, appropriate statements of risks and cautionary language.

**14. The Company Website**

The Company will use its website as one of its primary communication conduits to enhance existing modes of disseminating information, but not as a substitute for existing modes. The website will provide for email communication with the Company.

**15. Compliance**

This policy should be read in conjunction with the Code of Conduct and Insider Trading Policy. AIMFLEX is committed to comply with all applicable laws and stock exchange rules on the disclosure of financial and other information about the Company. In case of contradiction between this policy and applicable laws, applicable laws shall prevail.

THIS POLICY WAS ADOPTED BY THE BOARD ON 27th May 2021