



## **MEDIA CHINESE INTERNATIONAL LIMITED**

*(Incorporated in Bermuda with limited liability)*

(Malaysia Company No. 200702000044)

(Hong Kong Stock Code: 685)

(Malaysia Stock Code: 5090)

## **CORPORATE DISCLOSURE POLICY AND PROCEDURES**

### **1. INTRODUCTION**

The Board of Directors (the “Board”) of Media Chinese International Limited (the “Company”) is committed to promoting consistent disclosure practices aiming at timely, accurate, complete and broadly disseminated disclosure of material information (inside information) pertaining to the Company and its subsidiaries (the “Group”) to the market.

This Corporate Disclosure Policy and Procedures (the “Policy”) outlines the Company’s approach toward the determination and dissemination of sensitive and material information to investors, stakeholders, analysts, media, regulators, the investing public and other relevant persons in conformity with any and all the applicable legal and regulatory requirements and ensuring equal access to such information to avoid selective disclosure.

In formulating this Policy, the Company has taken into account the disclosure practices and recommendations of the Malaysian Code on Corporate Governance and its disclosure obligations contained in the Main Market Listing Requirements of Bursa Securities Malaysia Berhad (the “Bursa Securities”), the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited (the “HK Stock Exchange”) and the Corporate Governance Code contained in Appendix 14 of the Rules Governing the Listing of Securities on the HK Stock Exchange.

### **2. SCOPE OF APPLICATION**

The Policy is applicable to the Board of Directors, management, officers, employees of the Group.

This Policy covers, but is not limited to the following:

- (a) documents filed with, and announcements to Bursa Securities and the HK Stock Exchange (collectively, the “Stock Exchanges”), the Malaysian Securities Commission, the Hong Kong Securities and Future Commission, and other regulators or authorities, the Company’s annual report, financial statements, quarterly and/or interim reports, press releases, circular to shareholders, letters to stakeholders, electronic mail communication and information contained in the Company’s corporate website and digital platforms;

- (b) oral statements made at group and individual meetings, telephone conversations, interviews and press conferences with members of the investment community or with employees; and
- (c) any other dealings with the general public.

This Policy does not apply to communications made in the ordinary course of business of the Group not involving material information.

### **3. DESIGNATED SPOKESPERSON**

The authorised spokespersons for the Company are:

- i) Chairman of the Board of Directors;
- ii) Executive Director cum Group Chief Executive Officer (Group CEO); and
- iii) any other officers as may be authorised by the Chairman or the Executive Director cum Group CEO.  
(collectively, the “Authorised Spokesperson”)

Employees other than the Authorised Spokesperson shall not respond to inquiries from the investment community or media unless authorised to do so by the Authorised Spokesperson. All such queries should be referred to the Authorised Spokesperson.

### **4. IMMEDIATE DISCLOSURE OF MATERIAL INFORMATION**

#### **4.1 Immediate disclosure of material information**

An information is considered material if it is reasonably expected to have material effect on the:

- i) price, value or market activity of the Company’s securities;
- ii) investor’s decision in determining his choice of action.

The Board with the assistance of the Executive Director cum Group CEO and/or Management and/or the Company Secretary, shall exercise judgment determining whether the likely effect of the information is deemed to be material.

The Board shall be guided by the Bursa Securities Listing Requirements and the HK Listing Rules in respect of the events requiring immediate disclosures to the Stock Exchanges. The announcements shall be made available on the Company’s corporate website.

#### **4.2 Withholding of material information**

Under the following exceptional circumstances, the Company is allowed to withhold or delay the disclosure of the material information temporarily, provided that complete confidentiality is maintained.

- i) when disclosure would prejudice the ability of the Company to pursue its corporate objectives;
- ii) when the facts are in a state of flux; or
- iii) where the company or securities laws restrict such disclosure.

#### 4.3 **Maintaining confidentiality**

In the event where material information is being temporarily withheld, the Company must ensure that strict confidentiality of such material information is maintained.

Any employee privy to confidential information is prohibited from communicating such information to anyone else, unless it is necessary to do so in the course of business or required by the law or authorised by the Board.

However, in the event of leakage of material information, the Company shall take appropriate action to make an immediate announcement to the Stock Exchanges.

### **5. PROCEDURES FOR DISCLOSURE OF MATERIAL INFORMATION**

The Company may request the Stock Exchanges for a suspension in trading of the Company's securities if the Chairman of the Board or the Executive Director cum Group CEO believes that it would assist in having the news or material information better understood and widely disseminated.

The Head of Finance, Legal and other relevant departments or business units have the duty to review and verify the accuracy of all financial data and information contained in the announcement/document.

The Board shall manage all the Company's release of announcement/documents to the Stock Exchanges through the Company Secretary or a designated person authorised by the Board. All announcements/documents shall be first approved by the Board prior to the releases.

### **6. PUBLIC DISSEMINATION**

The Company undertakes to disclose material information in a manner which optimizes the extent of dissemination to the public. No disclosure of material information shall be made on an individual or selective basis to analysts, shareholders, media or other persons, unless such information has previously been fully disclosed and disseminated to the public.

### **7. RESPONSE TO MARKET RUMOURS**

Generally, the Company shall not comment on 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 rumour or report 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 event 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 the Stock Exchanges 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.

### **8. RESPONSE TO UNUSUAL MARKET ACTIVITY**

Where there is unusual trading activity or price movement, the Company shall immediately undertake due enquiry with relevant persons such as its Director, major shareholders and persons

familiar with the affairs of the Company, to determine the cause and issue a clarifying announcement.

## **9. PROMOTIONAL DISCLOSURE ACTIVITY**

Guided by the principles of fairness and transparency, the Company shall not participate in any form of promotional disclosure activity that may have misleading effect on its investors or cause unwarranted activity within its securities.

## **10. TRADING RESTRICTIONS**

The Company affirms its awareness of the provisions of the Malaysian Capital Markets and Services Act, 2007, the Malaysian Companies Act, 2016 and the relevant provisions of the Hong Kong Securities and Futures Ordinance, in regards to insider trading.

Under Section 188(1) of the Malaysian Capital Markets and Services Act, 2007, an insider is a person who:

- (a) possess information that is not generally available which, on becoming generally available, a reasonable person would expect it to have a material effect on the price or the value of the securities;
- (b) knows or ought reasonably to know that the information is not generally available.

Insiders are prohibited to deal in the Company's securities while in possession of the material information, nor may they pass on that information to help another person deal in the Company's securities.

From time to time, 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 Bursa Securities Listing Requirements and the HK Listing Rules.

## **11. COMMUNICATION WITH FINANCIAL ANALYSTS, MEDIA AND INVESTORS**

The Company will provide only factual and non-speculative information during briefing or interview.

Unless otherwise authorised by the Company, only the Authorised Spokesperson are permitted to make public oral statements or initiate contacts with analysts, media and investors on behalf of the Company. All briefing material and information must be first approved by the Chairman of the Board or the Executive Director cum Group CEO.

## **12. CONSEQUENCE OF NON-COMPLIANCE**

The Company and the Board view any breaches and/or non-observance of the Policy seriously and shall take possible action against any employee who violates this Policy.

If it appears that the employee may have also violated certain securities laws, the Company may refer the matter to the appropriate regulatory authorities for further investigations.

*(This Policy was adopted by the Board on 24 November 2021.)*