



PLENITUDE BERHAD CORPORATE DISCLOSURE POLICY

1. POLICY STATEMENT

- (i) Plenitude Berhad (“the Company”) is committed to provide its shareholders, stakeholders and investors with comprehensive, accurate and quality information on timely and even basis of the Company’s and its subsidiaries (“Plenitude Group”) operations, financial condition and future prospects and in conformity with any and all applicable legal and regulatory requirements.
- (ii) This Corporate Disclosure Policy applies to all directors, management and employees of Plenitude Group. It outlines the Plenitude Group’s approach toward the determination and dissemination of material information, the circumstances under which the confidentiality of information will be maintained, and restrictions on insider trading. It also provides guidelines in order to achieve consistent disclosure practices across the Plenitude Group.

2. OBJECTIVES

The objectives of the Corporate Disclosure Policy are:-

- (i) to raise awareness about and provide guidance to the Board of Directors (“the Board”), management and employees on, the Plenitude Group’s disclosure requirements and practices;
- (ii) to ensure quality and timeliness of the Plenitude Group’s disclosure of material information;
- (iii) to have in place efficient procedures for management of information which at the same time promotes accountability for disclosure of material information; and
- (iv) to build good investor relations with the investing public that inspires trust and confidence.

3. ADMINISTRATION OF CORPORATE DISCLOSURE

- (i) The Board is ultimately responsible for ensuring that the Plenitude Group’s disclosure requirements are fulfilled. The Board delegates the implementation of the Corporate Disclosure Policy to the Management Committee of Plenitude (“MCOM”), headed by the Executive Chairman (“EC”).
- (ii) The MCOM will oversee all matters relating to the Plenitude Group’s corporate disclosure practices and to ensure adherence to the Corporate Disclosure Policy.



- (iii) The functions and responsibilities of the MCOM include:-
- (a) creating awareness and understanding of the disclosure requirements;
 - (b) ascertaining whether corporate developments, transactions and other events constitute material information and if so, ensuring the procedures outlined in the Corporate Disclosure Policy are fully adhered to;
 - (c) timely, complete and accurate disclosure of material information or event in accordance with Main Market Listing Requirements (“MMLR”) of Bursa Malaysia and applicable securities laws;
 - (d) implementing and monitoring of compliance with the Corporate Disclosure Policy and undertaking reviews of any violations, including assessment and implementation of appropriate consequences and remedial actions;
 - (e) reviewing and updating the Corporate Disclosure Policy from time to time to ensure compliance with the MMLR of Bursa Malaysia and other regulatory requirements.

4. AUTHORISED SPOKESPERSONS

- (i) The Board has the overall responsibility of overseeing and co-ordinating the disclosure of material information for the Plenitude Group’s business, approves financial statements and major developments.
- (ii) The Plenitude Group designated the following Authorised Spokespersons for overseeing and co-ordinating the disclosure of material information

The list of the Authorised Spokespersons is as follows:-

Authorised Spokesperson(s)	Matters for response include all aspects in relation to:
EC; CEO; and COO.	<ul style="list-style-type: none"> • Group’s operations; • Financial positions & performance; • Future prospects; • Strategies and outlook; • Risk management & governance; • Management; and • Products and services.

- (iii) The authorised spokesperson(s) shall not disclose material information that has not been previously made public. The authorised spokesperson(s) may, from time to time, designate others to speak on behalf of the Plenitude Group or to respond to specific inquiries from the investment community or media.



- (iii) Employees other than the authorised spokesperson(s) shall not respond to inquiries from the investment community or media unless authorised to do so by the authorised spokesperson(s). All such queries should be referred to the authorised spokesperson(s).
- (iv) If there is any doubt about the appropriateness of supplying information to an outside party, an employee should contact the authorised spokesperson(s) for advice.

5. CORPORATE DISCLOSURE

(i) The Company's Website

- (a) The Company's website (www.plenitude.com.my) provides an avenue for the shareholders and the investing public to access information pertaining to the Company. It contains an "Investor Relations" section. All disclosure and material information documents of interest to investors will be made available and accessible by the public on the website as soon as after their release through the newswire service. These include corporate proposals, meetings, announcements, financial reporting and all other announcements that are required pursuant to the MMLR of Bursa Malaysia. Other supplemental and non-material information will be posted on the website as soon as practical after they are available.
- (b) The Corporate Office is responsible for ensuring that the information contained in the "Investor Relations" section of the website is accurate and will be kept up-to-date.

(ii) Restrictions on Insider Trading

- (a) Anyone who has access to material information of the Plenitude 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 investing public is Inside Information.
- (b) 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.
- (c) The relevant provisions of the Capital Markets and Services Act 2007 apply to all Insiders.
- (d) Restrictions on Insider Trading shall apply until a reasonable period of time has lapsed after announcement on such transaction has been made to Bursa Malaysia.



5. CONSEQUENCES FOR NON-COMPLIANCE WITH THE DISCLOSURE POLICY

An employee who violates the Corporate Disclosure Policy may face disciplinary action, which may result in the termination of employment. The violation of the Corporate Disclosure Policy may also violate certain securities laws. If Plenitude Group discovers that an employee has violated such securities laws, it may refer the matter to the appropriate regulatory authorities, which could lead to penalties, fines or imprisonment.

The Board of Directors has adopted this Corporate Disclosure Policy on 20 June 2014.