

CORPORATE DISCLOSURE POLICY

<u>CONTENTS</u>	Page
1. Introduction	1
2. Objectives	1
3. Application and Scope	1- 2
4. Structure For Corporate Disclosure	
<i>A. Members of Corporate Disclosure Committee (“CDC”)</i>	2
<i>B. Functions and Responsibilities of the CDC</i>	2 - 3
<i>C. Authorised Spokesperson(s)</i>	3
5. Maintaining Confidentiality	3 - 4
6. Procedures On Corporate Disclosure	
<i>A. Material Information</i>	4
<i>B. Procedures for Disclosure of Material Information</i>	4 - 5
<i>C. Insider and Employee Trading</i>	5 - 7
<i>D. Response to Rumours or Reports</i>	7 - 8
<i>E. Forward-looking Information</i>	8
7. <i>Communications with Financial Analyst, Media and Investing Public</i>	
<i>A. Analysts, Investors and the Media</i>	8
<i>B. Investor and Industry Conferences</i>	8
<i>C. Analyst’ Reports</i>	8 - 9
<i>D. Review of Presentations and Hand-out Materials</i>	9
<i>E. Company’ Website</i>	9
<i>F. Comments and Feedback’s Channel</i>	9
8. Review	9

1. Introduction

BP Plastics Holding Bhd (“BPPLAS” or “the Company”) is committed to provide its shareholders, stakeholders, investors and the public in general with comprehensive, accurate and quality information on timely basis to enable them in making informed investment decisions. The purpose of this Policy is to develop and maintain an established framework for making disclosure of corporate information on the Company.

2. Objectives

The objectives of this Corporate Disclosure Policy are as follows:-

- i) To raise awareness and provide guidance to the Board of Directors (“Board”), Management, Officers and Employees on the Company’s disclosure requirements and procedures/practices;
- ii) To provide guidance and policies in disseminating corporate information to, and in dealing with shareholders, stakeholders, analysts, media, regulators and the investing public;
- iii) To ensure compliance with all applicable legal and regulatory requirements on disclosure of material corporate information; and
- iv) To build good investor relations with the investing public that inspires trust and confidence.

3. Application and Scope

3.1 Applicability

This Policy applies to all directors, officers, employees, consultants and service providers/contractors, where applicable of the Company and its subsidiaries (“the Group”). This Policy covers, but is not limited to the followings:-

- i.) Disclosure documents as required to be filed with the Malaysian securities regulators including the Company’s annual and quarterly reports.
- ii.) Financial and non-financial disclosures;
- iii.) Press releases;
- iv.) Letters to shareholders;
- v.) Information contained on the Company’s website and other electronic communications;
- vi.) Interviews with the media;
- vii.) News conferences; and
- viii.) Any other dealings with the general public.

This Corporate Disclosure Policy (“CDP”) does not apply to communication made in the ordinary course of business of the Company and its subsidiaries not involving material information.

3.2 Compliance

Each Employee of the Group has a duty to read and understand the CDP. Violation of the CDP can result in disciplinary action, including termination of employment. The violation of the CDP may also violate certain securities laws, and if a Director or Employee of the Group has violated such securities laws, the Company may refer the matter to the appropriate regulatory authorities.

4. Structure For Corporate Disclosure

The Board is ultimately responsible for ensuring that this Policy is implemented effectively and consistently, and that the disclosure requirements as set out are fulfilled.

The implementation of the Policy is delegated by the Board to the Corporate Disclosure Committee (“CDC”) of the Company.

A.) The Members of CDC are as follows:

- a. Managing Director (Chairman of the CDC)
- b. Executive Directors
- c. Financial Controller
- d. Head of Corporate Planning & Risks Governance
- e. Company Secretary

B.) The Functions and Responsibilities of the CDC include:-

- (i) Creating awareness and understanding of the disclosure requirements;
- (ii) Ascertaining whether corporate developments, transactions and other events constitute material information and if so, ensuring the procedures outlined in this Corporate Disclosure Policy are fully adhered to;
- (iii) 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;

- (iv) 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; and
- (v) Reviewing and updating the Corporate Disclosure Policy from time to time to ensure compliance with the MMLR of Bursa Malaysia and other applicable regulatory requirements.

C.) Authorised Spokesperson(s)

- (i) The authorised spokesperson for the Company is the Chairman and Managing Director (“MD”) and any other appointed Officers as may be authorised by the spokesperson.
- (ii) The authorised spokesperson shall not disclose material information that has not been previously made public. He/She may, from time to time, respond to specific inquiries from the investment community or media.
- (iii) Employees of the Group other than the authorised spokesperson shall not respond to inquiries from investment community or media unless authorised to do so by the authorised spokesperson. All such queries should be referred to the authorised spokesperson.
- (iv) If there is any doubt about the appropriateness of supplying information to an outside party, an employee of the Group should contact the authorised spokesperson for advice.

5. Maintaining Confidentiality

Any employee of the Group, who is privy to confidential corporate information is prohibited from communicating such information to anyone else, unless required in the ordinary course of business or required by law or as authorised by the Corporate Disclosure Committee. Efforts will be made to limit access to such confidential information to only those who “need to know” the information. In the event that outside parties are known to have undisclosed material information covering the Company/Group, they will be told/informed by the CDC that they must not divulge such information to anyone else. Such outside parties may be requested to confirm

their commitment to non-disclosure under a written confidentiality agreement with the Company as and when determined by the Company.

For prevention of misuse or inadvertent disclosure of material information, the following general procedures should be observed at all times:

- i) **Security and code names**
Documents and files containing confidential information should be kept in a safe place or within the Company's secured IT system, with accessibility restricted to individuals who "need to know" in the necessary course of their work. Code names should be used, where necessary.
- ii) **Prohibition to discuss in public places**
Confidential matters should not be discussed in places where the discussion may be overheard, including but not limited to, elevators, hallways, restaurants, bars, restrooms, airplanes or taxis.
- iii) **Exercise caution when reading confidential documents with devices**
One should exercise caution when reading of confidential documents or smart phone(s) or other personal digital assistant devices in public places.
- iv) **Accompanying visitors**
Visitors should be accompanied by Company personnel to ensure that they are not left alone in offices or sites containing confidential information.

6. Procedures and Practices on Corporate Disclosure

A.) Material Information

- a. Material Information is any information about the Company and its subsidiaries which are reasonably expected to have a material effect on:
 - i. the market price, value or market activity of the Company's securities; and
 - ii. the decision of a holder of securities or an investor in determining his/her choice of action.

B.) Procedures for Disclosure of Material Information

- a. All Company's releases of announcements of Material information to Bursa Securities will be managed by the Company Secretary.

- b. The Corporate Secretarial, the appointed Investor Relations personnel/Company, where applicable and appointed investment bank will draft the announcement to be reviewed by the CDC to ensure compliance and accuracy of the contents.
- c. The Finance or relevant department will be required to review or verify data(s), as and when is necessary.
- d. All announcements will be approved by MD or Executive Directors before the release.
- e. For news/ media releases, the CDC has the overall responsibility to ensure that the contents are clearly and effectively communicated to the intended substance and meaning of the information to the Public.
- f. To ensure widest possible public dissemination, once the announcements or media releases been made, it must also be posted and make available on the Company's website.
- g. Upon dissemination of announcement and media releases, the appointed Investor Relations personnel/Company, where applicable is to ensure accurate media reporting and will take any corrective measures, if necessary.
- h. When required, the Company is required to file a material change report for immediate announcement with Bursa Securities.

C.) Insider and Employee Trading

- a. Capital Market & Services Act 2007

Pursuant to Section 188(1) of the Capital Market & Services Act 2007 ("CMSA"), a person is an "insider" if that person:

- i. possesses 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 Company's securities; and
- ii. knows or ought reasonably to know that the information is not generally available.

In addition, Section 188(2) of the CMA states that an insider shall not, whether as principal or agent, in respect of any securities to which information in subsection 188(1) relates:

- i. acquire or dispose of, or enter into an agreement for or with a view to the acquisition or disposal of such securities; or
- ii. procure, directly or indirectly, an acquisition or disposal of, or the entering into an agreement for or with a view to the acquisition or disposal of such securities.

Based on the above definitions, these persons would include but not limited to the following:

- i. Directors of the Company and subsidiaries;
- ii. Employees;
- iii. Persons who provide business or professional services to the Company; and
- iv. Any other person or company informed about undisclosed material information about the Company by any of the above parties.

As such, the persons stated above with insider knowledge of undisclosed material information, is prohibited from trading in the Company's securities until after the information has been publicly disclosed at least one (1) full market day from the date of the announcement of material information.

b. Closed Period

The Company adopts the Closed Period as stated in the Main Market LR, defined as a period commencing thirty (30) calendar days before the targeted date of announcement up to the date of the announcement of the Company's quarterly results to Bursa Malaysia.

All Authorised Spokespersons are prohibited from commenting on current period earnings estimates and financial assumptions; and must also avoid initiating meetings (in person or by phone) with investment analysts, security holders, potential investors and the media on items significant to investors, other than responding to unsolicited inquiries concerning factual information.

Having stated the above, the Company does not stop all communications with analysts or investors during this period and may, for example, participate in investment meetings and conferences

organised by other parties, as long as material information which has not been publicly disclosed, is not selectively disclosed.

The Company Secretary will advise the Directors and principal officers of the Company on the trading restrictions in the Company's securities in accordance with the provisions of the Bursa Securities Main Market LR.

D.) Response to Rumours or Reports

- a. Whenever the Company becomes aware of any rumour or report, true or false, that contains material information, the listed issuer must make due enquiry and immediately publicly clarify, confirm or deny the rumour or report. The Company must publicly clarify any rumour or report which is in any form whatsoever and howsoever including that by word-of-mouth and not limited to an article or otherwise, published in a newspaper, newswire, magazine, a broker's market report or any other publication.
- b. In the case of a rumour or report containing erroneous material information which has been circulated, the Company must immediately announce to the Bursa Securities a denial or clarification of the rumour or report and provide facts sufficient to support the denial or to clarify any misleading aspects of the rumour or report. A reasonable effort is expected from the Company to bring the announcement to the attention of the particular group that initially distributed the report. In the case of an erroneous newspaper article, for example, this should be done by sending a copy of the announcement to the newspaper's financial editor, or in the case of an erroneous broker's market report, by sending a copy to the broker responsible for the report.
- c. In the case of a rumour or report containing material information that is correct, an announcement setting forth the facts must be prepared for public release, which must include but not be limited to, an indication of the state of negotiations or of corporate plans in the rumoured area. Such announcements are essential even if the matter has yet to be presented to the Board of Directors for consideration.
- d. In the case of a rumour or report predicting future sales, earnings or other quantitative data, no response from the Company is ordinarily required. However, if such a report is manifestly based on or contains erroneous

information, or is wrongly attributed to the Company, the Company must respond promptly to the supposedly factual elements of the rumour or report. In addition, the listed issuer must include in the announcement a statement to the effect that the Company itself has made no such prediction and currently knows of no facts that would justify making such a prediction.

E.) Forward-looking Information

From time to time, the Company may convey its future direction to the public in order to assist the market to accurately value the Company's securities. The Company shall only discuss general trends, events, commitments and uncertainties that are reasonably expected based on historical and currently known data. Documents containing forward-looking information will be accompanied by a "Cautionary Statement" which cautions the reader on the risks and uncertainties that could cause actual results and developments to differ materially from those envisaged in the forward-looking information. It includes a statement to disclaim the Company's intention or obligation to update the forward-looking information, whether as a result of new information, future events or otherwise.

7. Communications with Financial Analyst, Media and Investing Public

A.) Analysts, Investors and the Media

- a) Authorised Spokespersons may meet with analysts, institutional investors, media and other market professionals on an individual or small group basis as needed and will initiate contacts or respond to their calls in a timely, consistent and accurate manner in accordance with this Corporate Disclosure Policy.
- b) If during such meetings or responses to the calls, there is inadvertent selective disclosure of previously undisclosed material information, the Company will immediately disclose such information via Public Disclosure Mechanism such as Company's website and Bursa Announcement.

B.) Investor and Industry Conferences

Copies of presentations made during any investor/industry conference will be made available on the Company's website.

C.) Analyst Reports

Analysts may from time to time request the Company to review draft analysts' reports and only Authorised Spokespersons will comment on such reports. Comments will be limited to identifying publicly disclosed factual information that could affect the analyst's model and to pointing out inaccuracies or omissions with reference to publicly available information. The Company will not attempt to influence an analyst's conclusions.

The Company will not externally distribute analyst's research reports but, if requested, will advise which analysts follow the Company, accompanied by an appropriate disclaimer that the view expressed in any reports, including all forward-looking information, are the views of the analysts and not of the Company.

D.) Review of presentations and hand-out materials

The appointed Investor Relations personnel should provide an advance copy of all presentation materials to the Corporate Disclosure Committee who will review the presentation materials, handouts and speaking notes for accuracy and consistency with other public disclosures. The Corporate Disclosure Committee will confirm with the appointed Investor Relations personnel/Company, where applicable whether the contents or remarks are acceptable from a disclosure perspective.

E.) The Company' Website

The Company's website (www.bpplas.com) 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 to and accessible by the public on the website as soon as possible 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.

F.) Comment and Feedback's Channel

The Company has developed a channel (IR's email) for shareholders and all stakeholders to provide their comments and feedback in relation to the Company's/Group's operations, performance, governance and strategic matters. The Company will consider the relevant comments and feedback received in establishing its corporate strategy.

8. Review

This Corporate Disclosure Policy shall be reviewed periodically by the Board in accordance with the needs of the Company.