

**DATAPREP HOLDINGS BHD**  
(Company No. 183059-H)  
(Incorporated in Malaysia)

## **CORPORATE DISCLOSURE POLICY AND PROCEDURES**

### **1. CORPORATE DISCLOSURE POLICY**

#### **A. Policy Statement**

- (i) Dataprep Holdings Bhd (“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 (“Dataprep Group”) operations, financial condition and future prospects and in conformity with any and all applicable legal and regulatory requirements.
- (ii) This Disclosure Policy applies to all directors, management and employees of Dataprep Group. It outlines the Dataprep 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 Dataprep Group.

#### **B. Objectives**

The objectives of the Disclosure Policy are:-

- (i) to raise awareness about and provide guidance to the Board of Directors (“the Board”), management and employees on, the Dataprep Group’s disclosure requirements and practices;
- (ii) to ensure quality and timeliness of the Dataprep 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.

## 2. ADMINISTRATION OF CORPORATE DISCLOSURE

The Board is ultimately responsible for ensuring that the Dataprep Group's disclosure requirements are fulfilled. The Board delegates the implementation of the Disclosure Policy to the Executive Committee (EXCO).

- (i) The EXCO has been established to oversee all matters relating to the Dataprep Group's corporate disclosure practices and to ensure adherence to the Disclosure Policy.
- (ii) The functions and responsibilities of the EXCO 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 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 Disclosure Policy and undertaking reviews of any violations, including assessment and implementation of appropriate consequences and remedial actions;
  - (e) reviewing and updating the Disclosure Policy from time to time to ensure compliance with the MMLR of Bursa Malaysia and other regulatory requirements.

### A. Authorised Spokespersons

- (i) The Board has the overall responsibility of overseeing and co-ordinating the disclosure of material information for the Dataprep Group's business, as well as approving financial statements and major developments.
- (ii) The Dataprep Group designated the following Authorised Spokespersons for overseeing and co-ordinating the disclosure of material information:-

	<b>Authorised Spokespersons</b>	<b>Responsibility</b>
1)	Group Managing Director	Day-to-day management and financial responsibility, responsible for all financial reports, decides/recommends on materiality

	<b>Authorised Spokespersons</b>	<b>Responsibility</b>
		and disclosure, approves announcements and press releases
2)	Chief Operating Officer	Responsible for overall operations, recommends on materiality and disclosure and approves announcements of non-financial matters
3)	Chief Financial Officer	Responsible for financial controls, financial statements and financial reports
4)	Company Secretary	Ensures regulatory compliance, liaison and communication with Bursa Malaysia, prepares announcement

- (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 Dataprep Group or to respond to specific inquiries from the investment community or media.
- (iv) 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).
- (v) 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.

### **3. CORPORATE DISCLOSURE**

#### **A. The Company's Website**

- (i) The Company's website ([www.dp.com.my](http://www.dp.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 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.

- (ii) The EXCO 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.

**B. Restrictions on Insider Trading**

- (i) Anyone who has access to material information of the Dataprep 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.
- (ii) 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.
- (iii) The relevant provisions of the Capital Markets and Services Act 2007 apply to all Insiders.
- (iv) 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.

**4. CONSEQUENCES FOR NON-COMPLIANCE WITH THE DISCLOSURE POLICY**

An employee who violates the Disclosure Policy may face disciplinary action, which may result in the termination of employment. The violation of the Disclosure Policy may also violate certain securities laws. If Dataprep 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 and Procedures on 23 May 2014.