



IMPIANA HOTELS BERHAD

(REGISTRATION No.200601021085 (740838-A))

CORPORATE DISCLOSURE POLICY

1. CORPORATE DISCLOSURE POLICY

A. Policy Statement

- i. The Company is committed to provide its shareholders, stakeholders and investors with comprehensive, accurate and quality information on a timely basis of the Company's and its subsidiaries 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 the Group. It outlines the 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 Group.

B. Objectives

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

- i. The Board is ultimately responsible for ensuring that the Group's disclosure requirements are fulfilled. The Board delegates the implementation of the Disclosure Policy to the Chief Operating Officer, Chief Financial Officer and the Company Secretary (collectively referred to as "the EXCO").
 - a) The EXCO has been established to oversee all matters relating to the Group's corporate disclosure practices and to ensure adherence to the Disclosure Policy.
 - b) The functions and responsibilities of the EXCO include:
 - creating awareness and understanding of the disclosure requirements;
 - 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;

- timely, complete and accurate disclosure of material information or event in accordance with Main Market Listing Requirements (“Listing Requirements”) of Bursa Securities and applicable securities laws;
- 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; and
- reviewing and updating the Disclosure Policy from time to time to ensure compliance with the Listing Requirements of Bursa Securities and other regulatory requirements.

3. AUTHORISED SPOKESPERSON

- i. The Board has the overall responsibility of overseeing and coordinating the disclosure of material information for the Group’s business, as well as approving financial statements and major developments.
- ii. The Group has designated Chief Operating Officer as the Authorised Spokesperson.
- iii. In the absence of the Chief Operating Officer Chief Financial Officer shall be the Authorised Spokesperson.
- iv. The following persons shall be responsible for overseeing and coordinating the completeness and disclosure of material information:

Authorised persons Responsibility

1. Chief Operating Officer
 - Day to day management & overall operations
 - Recommends announcements and press releases
 - Liaison and communication with analyst and media.
 2. Chief Financial Officer
 - Financial controls, financial statements and financial reports
 - Recommends materiality and disclosure
 - Approves announcements for financial matters such as quarterly results
 3. Chief Operating Officer & Company Secretary
 - Ensures regulatory compliance
 - Liaison and communication with Bursa Securities
 - Prepares announcement
- v. The Authorised Spokesperson shall not disclose material information that has not been previously made public. The Authorised Spokesperson may, from time to time, designate others to speak on behalf of the Group or to respond to specific inquiries from the investment community or media.

- vi. 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.
- vii. If there is any doubt about the appropriateness of supplying information to an outside party, an employee should contact the Authorised Spokesperson for advice.

4. PROCEDURES FOR DISCLOSURE OF MATERIAL INFORMATION

- i. The EXCO will manage all of the Company's releases of announcements of material information to Bursa Securities through the Company Secretary or the appointed merchant bank in accordance with the applicable securities law and Listing Requirements and the announcement shall then be approved by the EXCO before release to Bursa Securities.
- ii. The EXCO and the relevant departments will review and verify the accuracy of all financial data and all information contained in the announcement to ensure that disclosures are consistent with the prevailing accounting standard and guidelines.
- iii. The announcement released to Bursa Securities can be accessed through the Company's website.

5. CORPORATE DISCLOSURE

A. The Company's Website

- i. The Company's website (www.impianaberhad.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 Listing Requirements of Bursa Securities. 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 kept up-to-date.

B. Restrictions on Insider Trading

- i. Anyone who has access to material information of 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 investing public is Inside Information.
- ii. Insiders shall not deal in the Company's securities while in possession of Inside Information, nor shall they pass on that information to assist 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 Securities.

6. CONSEQUENCES FOR NON-COMPLIANCE WITH THE DISCLOSURE POLICY

- i. 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 the Company 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 and/or imprisonment.

Approved and adopted by the Board of Directors on 25 May 2021
