MESINIAGA
CORPORATE DISCLOSURE POLICY

Table of Contents

1. Introduction

Mesiniaga Berhad ("Mesiniaga" or "the Company") is committed to maintaining high standards of transparency, integrity, and accountability in its disclosure practices.

This Corporate Disclosure Policy ("the Policy") establishes the framework and procedures to ensure that all material information is disclosed in a timely, accurate, and equitable manner.

The objectives of this Policy are to:

i. Ensure compliance with Bursa Malaysia Securities Berhad's disclosure requirements.
ii. Promote timely and accurate disclosure of material information.
iii. Ensure fair and equal access to information for all investors.
iv. Prevent selective disclosure and insider trading.
v. Safeguard market integrity and investor confidence.

This Policy should be read together with Chapter 9 of the Main Market Listing Requirements ("Listing Requirements") of Bursa Malaysia Securities Berhad ("Bursa Malaysia"), Capital Markets and Services Act 2007 ("CMSA") and any other applicable rules and regulations.

2. Scope and Applicability

This Policy applies to the Board of Directors, Senior Management, all employees, and other parties authorised to act on behalf of the Company.

3. General Disclosure Principles

The Company shall adhere to the following principles:

i. Timeliness
   - Material information shall be disclosed immediately upon becoming aware of it.

ii. Accuracy
   - Disclosures must be factual, clear, and not misleading.

iii. Equal Access
   - All investors must have equal and simultaneous access to material information.

3. General Disclosure Principles (Cont'd)

i. Consistency
- Information must be consistent across all communication channels.

ii. Confidentiality
- Information must remain confidential until publicly disclosed.

iii. Prevention of False Market
- Disclosures must not create or maintain a false or misleading market in the Company's securities.

4. Material Information

Material information refers to any information that may reasonably be expected to affect the price, value, or trading of the Company's securities, or influence investment decisions. Materiality shall be assessed having regard to both quantitative and qualitative factors, including the expected impact on price, value or investor decision-making.

Examples include financial results, major contracts, acquisitions, changes in the Board or key management, litigation, operational disruptions, and any other information that may reasonably be expected to have a material effect on the Company's securities.

5. Identification and Escalation

All employees are expected to identify information that may be material. Such information must be immediately escalated to the Chief Executive Officer.

The Company Secretary shall coordinate the assessment of materiality and ensure compliance with disclosure obligations.

6. Approval and Disclosure Process

Material disclosures shall be subject to review and approval by the Chief Executive Officer and/or the Board of Directors, as required. The Company Secretary shall advise on compliance with Listing Requirements and other applicable regulatory requirements.

6. Approval and Disclosure Process (Cont'd)

Material information shall be disclosed through an immediate announcement to Bursa Malaysia. Where appropriate, the Company may also disseminate such information through its corporate website, press releases, investor briefings, or other authorised communication channels.

7. Temporary Withholding

Disclosure of material information may be temporarily withheld where:

i. the information is confidential;
ii. immediate disclosure would prejudice the Company's legitimate interests; and
iii. confidentiality can be maintained.

Confidentiality must be strictly preserved during the withholding period. If confidentiality is compromised, the Company must immediately disclose the information to Bursa Malaysia.

8. Dissemination of Information

Material information shall first be disclosed via an announcement to Bursa Malaysia. The Company may thereafter disseminate such information through other communication channels, including its corporate website, press releases, annual reports, general meetings, and investor communications.

The Company's website may serve as a supplementary communication platform for announcements, financial reports, and investor materials.

9. Selective Disclosure

The Company shall not disclose material non-public information selectively to any external parties.

In the event of inadvertent disclosure of material information, the matter shall be escalated to the Chief Executive Officer for determination of the appropriate course of action.

9. Selective Disclosure (Cont'd)

The Company Secretary shall promptly assess the materiality of the information. Where the information is assessed to be material, the Company shall promptly make an announcement to Bursa Malaysia to ensure equal access to such information.

The Company shall also undertake appropriate remedial actions, including conducting an internal review of the circumstances to identify the cause and any control gaps, and implementing appropriate control and process improvements to address the disclosure and prevent recurrence.

10. Rumours and Market Speculation

The Company shall not respond to rumours or market speculation through selective or informal channels. Where a rumour or report contains or is based on information that is material, or where it is likely to affect the Company's share price or trading activity, the Company shall make an appropriate announcement to Bursa Malaysia to clarify, confirm, or deny the matter.

11. Unusual Market Activity

The Company shall promptly consider any unusual market activity in its securities and, where appropriate, make an announcement to Bursa Malaysia to clarify whether it is aware of any material information, development, or other matter that may have contributed to such activity, and to confirm its compliance with the Listing Requirements. The Company shall also respond to any query from Bursa Malaysia in a timely, accurate and transparent manner.

12. Public Communications

All public communications must be factual, balanced, and not misleading, and must avoid exaggerated or promotional statements that may create unwarranted market interest or false expectations, or otherwise influence the market price or trading activity of the Company's securities. All external communications shall be made only by authorised spokespersons in accordance with Section 14.

13. Insider Trading

An "Insider" refers to any person in possession of material non-public information. Insiders must not:

i. trade in the Company's securities while in possession of material non-public information; and/or

ii. disclose such information to others.

The Company shall ensure compliance with the Capital Markets and Services Act 2007 ("CMSA") and any other applicable insider trading laws and regulatory requirements.

14. Authorised Spokespersons

Only the following persons are authorised to communicate externally on behalf of the Company:

i. Chief Executive Officer (CEO)

Primary spokesperson on all matters relating to the Company, including, but not limited to, corporate, strategic, financial, operational and business matters, as well as media and public engagements.

ii. Deputy Chief Executive Officer (DCEO)

May act as spokesperson on all Company matters, in the absence of, or as authorised by, the Chief Executive Officer.

iii. Financial Controller

Engages with investors and analysts within the scope of responsibility.

iv. Company Secretary

Coordinates all disclosures to Bursa Malaysia and communicates on regulatory and compliance-related matters.

v. Corporate Communication Department

Engages with the media on publicly disclosed information.

14. Authorised Spokespersons (Cont'd)

Authorised spokespersons listed in items (ii) to (v) shall obtain prior approval from the Chief Executive Officer before making any external communication on behalf of the Company.

No other employee shall communicate externally on behalf of the Company unless prior written approval has been obtained from the Chief Executive Officer.

All external communications must be consistent with information that has been publicly disclosed and must not contain material non-public information.

15. Record Keeping

The Company will maintain complete records of disclosures, announcements, and investor communications.

16. Breach of Policy

Any breach of this Policy by any individuals listed under Item 2 above may result in disciplinary action, legal action and/or regulatory penalties under applicable laws. The Company may also be subject to regulatory enforcement actions.

17. Investor Interaction and Communication

The Company is committed to maintaining appropriate engagement with shareholders, investors, analysts, and the media. No material non-public information shall be disclosed during such engagements.

All enquiries from shareholders, investors, analysts, the media and other external parties shall be channelled through the Corporate Communications Department via email at corpcomm@mesiniaga.com.my.

18. Review and updates

This Policy shall be reviewed annually, or earlier if required due to regulatory changes to ensure continued relevance and compliance.

[End of Policy]