



EMITS BERHAD

[Registration No. 202501005450 (1606864-T)]
(Incorporated in Malaysia)

CORPORATE DISCLOSURE POLICY

1. INTRODUCTION

As a public listed company, Emits Berhad ("**the Company**") and its subsidiaries ("**the Group**") are committed to provide accurate, timely, consistent and fair disclosure of corporate information to enable informed and orderly market decision by investors. This information is directed to a diverse audience of shareholders, stakeholders and the public generally.

This Corporate Disclosure Policy ("**Policy**") sets out the requirements for disclosure including the quality of disclosure to provide shareholders and investors with comprehensive, accurate and quality information on a timely basis.

In formulating this Policy, the Company has taken into account the recommendations contained in the Malaysian Code on Corporate Governance ("**MCCG**") and its disclosure obligations contained in the ACE Market Listing Requirements of Bursa Malaysia Securities Berhad ("**Bursa Securities**") ("**ACE LR**").

2. SCOPE OF POLICY

This Policy applies to all Directors, Management, principal officers and employees of the Group and those authorised to speak on their behalf.

This Policy covers, but is not limited to the following:-

- (a) Disclosure documents filed with the Malaysian regulators and written statements made in the Company's annual and quarterly reports;
- (b) Annual General Meeting;
- (c) Financial and non-financial disclosure;
- (d) Press releases;
- (e) Letters to shareholders;
- (f) Presentations by Senior Management;
- (g) Information contained on the Company's website and other electronic communications;
- (h) Oral statements made in Group meetings, individual meetings and telephone conversations, interviews with media, conversations with members of the investment community (which includes analysts, investors, investment dealers, broker, investment advisers and investment managers) or with employees;
- (i) Press Conferences;
- (j) Conference Call; and
- (k) Any other dealings with the general public.

This Policy does not apply to communication made in the ordinary course of business of the Group not involving material information.

3. OBJECTIVES

The objectives of this Policy are as follows:-

- (a) To raise awareness and provide guidance to the Board of Directors ("**Board**"), Management, principal officers and employees on the Company's disclosure requirements and practices;
- (b) To ensure that the Board, Management, principal officers and employees understand their obligations to preserve the confidentiality of material information;
- (c) To provide guidelines and policies in disseminating corporate information to, and in dealing with shareholder, stakeholders, analysts, media and the investing public;
- (d) To reinforce the Company's commitment in compliance with legal and regulatory requirements on disclosures; and
- (e) To build good investor relations with the investing public that inspires trust and confidence.

4. DESIGNATED PERSONS

The designated persons of the Company are responsible for ensuring compliance, overseeing, and coordinating the disclosure of material information. Generally, however, such designations will be limited to the:-

- Chairman of the Board; and
- Chief Executive Officer/Executive Directors.

The Chairman of the Board and Chief Executive Officer/Executive Directors will serve as the primary contact persons for the disclosure requirement and will engage other persons as stipulated above as necessary and appropriate to the matter at hand. In his or her absence, other persons can be contacted for matters referred to in this Policy.

5. PRINCIPLES OF DISCLOSURE CONTROLS AND PROCEDURES

5.1 Immediate Disclosure of Material Information

As a general guideline, Material information is any information which is expected to have a material effect on the following:-

- (a) The price, value or market activity of any of the securities of the Company; or
- (b) The decision of a holder of securities or an investor in determining his choice of action.

Without limiting the generality of the above, material information may include information which:-

- (a) concerns the Group's assets and liabilities, business, financial condition or prospects;
- (b) relates to dealings with employees, suppliers, customers and others;
- (c) relates to any event affecting the present or potential dilution of the rights or interests of the Group's securities; or
- (d) relates to any event materially affecting the size of the public holding of its securities.

The following guidelines will be followed by the Company to fulfil its obligation to make immediate announcement of material information:-

- (i) For the prescribed events as set out in Rules 9.04 and 9.19 of the ACE LR, the Company will immediately announce the event upon its occurrence;
- (ii) Materiality can be rather subjective, and the Company will take the approach of assessing the likely effect of the information on the activities and financial position of the Company or the price and performance of the Company's securities, in addition to whether the circumstances or event are measurable and would trigger the relevant materiality thresholds in the percentage ratio calculations set out in the ACE LR.

5.2 Withholding of Material Information and Maintaining Confidentiality

Material information may be kept confidential temporarily if the immediate disclosure would prejudice the ability of the Company to pursue its corporate objectives and in exceptional cases, as set out in the ACE LR. In such cases, the Company must ensure that the material information will be kept confidential to prevent leakage. The Company should ensure strictest confidentiality is maintained by limiting the number of people with access to or in possession of the material information and ensure that all confidential documents are being protected and secure.

The Company will monitor its market activity and rumours or news reports concerning the information (if any). If confidentiality of information is lost or cannot be maintained or is believed to have been inadvertently disclosed to third parties or where the material information has become generally available through the media or otherwise, the Company shall immediately announce the information to Bursa Securities.

5.3 Procedures for Disclosure of Material Information

All announcements to Bursa Securities will be prepared and/or reviewed by the Company Secretary, or the appointed Adviser in accordance with the applicable securities law and ACE LR and all announcements shall then be approved by the Chairman of the Board/ Managing Director/ Executive Director or other officer(s)/representative of the Company duly authorised ("**Authorised Persons**").

The Chief Financial Officer will review and validate all financial data contained in the announcement to ensure that disclosures are consistent with the prevailing accounting standards and guidelines.

The Company Secretary or the appointed Adviser shall release the announcement to Bursa Securities once the announcement is approved by any one (1) of the Authorised Persons.

5.4 Clarification, Confirmation or Denial of Rumours or Reports

Whenever the Company becomes aware of any rumour or report, the Company should enquire/ consult with its Directors, major shareholders and such other persons familiar with the matter to ascertain whether it is true or false or contains any material information and make immediate disclosure to clarify, confirm or deny the rumour or report. The disclosure can be in any form including that by word-of-mouth and not limited to an article or otherwise publish the disclosure in the media, broker's market report or any other publication. The Company, however, is not expected to respond to or clarify articles or reports if it considers the published information to be general in nature.

5.5 Unusual Market Activity ("UMA")

Where there is unusual price movement and or unusual trading activity in the shares of the Company, the Company must upon query from Bursa Securities immediately undertake a due enquiry with the relevant persons such as its Directors, major shareholders and persons familiar with the affairs of the Company to seek the cause of the unusual market activity and make the necessary announcement to the Bursa Securities.

If the Company is unable to determine the cause of the UMA, the Company will announce that there have been no undisclosed developments which would account for UMA.

5.6 Unwarranted Promotional Disclosure Activity

The Company must not engage in any promotional disclosure activity in any form which may mislead the investors or cause unusual price movement and trading activity in the securities of the Company. Such activities include news release, public announcements, predictions, reports or advertisements, which are unjustifiable, exaggerated, flamboyant, overstated or over-zealous.

5.7 Insider Trading

All Directors, Management, principal officers and employees of the Company and those mentioned below are prohibited from trading in the Company's shares at any time they are in possession of any undisclosed material information:-

- (a) Any individual who is having business relationship with and/or providing professional services to the Group; and
- (b) An "insider" under the definition of the Capital Markets and Services Act 2007.

5.8 Equal Access to Material Information

The Company must disclose to the public all material information necessary for informed investing and take reasonable steps to ensure that all investors who invested in the securities of the Company enjoy equal access to this information. The Company must ensure that no disclosure of material information is to be made on an individual or selective basis unless such information has previously been fully disclosed or disseminated to the public. The Company must immediately announce to Bursa Securities any non-public material information which has been inadvertently disclosed when responding to questions or when commenting on draft reports from journalists, analysts or fund managers.

5.9 Corporate Website

The Company must have its corporate website where the website must publish all announcements made pursuant to the ACE LR as soon as the announcements are released to the Bursa Securities' website. The Company must ensure that its website is regularly updated with current information and contained information to enhance investor relations which include the email address, name of designated persons and their contact numbers to enable the queries from the public be forwarded to the Company.

5.10 Periodic Disclosures

5.10.1 Quarterly Report

An interim financial report that is prepared on a quarterly basis ("**quarterly report**") must be announced to the Bursa Securities as soon as the figures are approved by the Board and in any event not later than two (2) months after the end of each quarter of a financial year. The quarterly report must include the information as stipulated in the ACE LR.

5.10.2 Issue of Annual Audited Financial Statements and Annual Report

The Company must issue its annual report that includes the annual audited financial statements on a consolidated basis together with the auditors' and Directors' reports of the Company and forward them to Bursa Securities and shareholders not later than four (4) months from the close of the financial year end of the Company. The annual audited financial statements together with the auditors' and Directors' reports must be announced to Bursa Securities not later than four (4) months from the close of the financial year end of the Company.

6. REVIEW OF THIS POLICY

This Policy shall be regularly reviewed by the Board to ensure compliance with the ACE LR and other regulatory requirements, as and when required, and communicate the new changes to all relevant parties.

7. REVISION OF THIS POLICY

The provisions of this Policy can be amended and supplemented from time to time by a resolution of the Board.

8. EFFECTIVE DATE

This Policy is effective from 11 November 2025.

History:-

Document No.	Version No.	Board's Approval Date	Effective Date
EMITS-008	1.0	11 November 2025	11 November 2025

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