



CORPORATE DISCLOSURE POLICY

Scope and objectives of Policy

Pursuant to the Listing Requirements (“LR”) set by Bursa Malaysia Securities Berhad (“Bursa Malaysia”) Paragraph 9.03 Part C, a prescribed minimum amount of disclosure has been outlined for listed issuers. This Corporate Disclosure Policy (hereinafter referred to as the “Policy”) aims to integrate the mandatory requirements set out in the LR with the Malaysian Code of Corporate Governance (“MCCG”), thus instilling the tenets of good governance within the practices of QL Resources Berhad (“QL” or “the Company”).

This document outlines the Company’s policy on the determination and dissemination of sensitive and material information to investors, stakeholders, local media, the investing public and other relevant persons in line with the applicable legal and regulatory requirements. This Policy is applicable to all Directors, Management staff, officers and employees of the Company and its subsidiaries.

Timely disclosure in accordance with the LR

Immediate announcements must be made of material information in accordance with the LR set out by Bursa Malaysia. Once materiality of the information has been assessed, the Company Secretary is responsible for the timely disclosure of the information in accordance with the disclosure obligations set out in the LR. A general guideline to determine materiality is if the information is reasonably expected to impact on:

- price, value or market activity of any of its securities; or
- investors’ decision in determining his course of action.

In relation to any material information that is being withheld temporarily, QL is committed to ensuring the strictest confidentiality is maintained, including limiting the number of persons having access to the material information and ensuring security of all confidential documents.

All disclosures made must be in a reader-friendly format allowing for easy understanding by all parties. QL is committed to disclosing information that is accurate, succinct, balanced, unambiguous and free of technical jargon.

Disclosures made are to adhere to the following protocols:

- all critical announcements are to be circulated to, and reviewed by, all members of the Board;
- all members of the Board are required to provide to the delegated person(s) by the Chair, Executive Chairman or Group Managing Director, with negative confirmation¹ or written approval of each announcement, prior to its release;

¹ For the purposes of this Policy, a negative confirmation constitutes the consent of a Director upon a timeline given by the delegated person(s) for the approval of an announcement prior to its release.



- any relevant parties referenced in the announcement should also review the announcement prior to its release, to confirm the accuracy of the information; and
- the Chair or Executive Chairman or Group Managing Director or Director in charged (or in their absence, the Company Secretary) is to provide his approval of the announcement before release to Bursa Malaysia.

Designated Spokesperson

The Company shall elect the Executive Chairman, Group Managing Director and the Investor Relation Manager as the spokesperson to be responsible for the oversight and coordination of the disclosure of material information to the markets. The duties of the spokesperson shall include:

- creating awareness amongst the directors, management and employees of QL on the importance of timely disclosures;
- review the material for disclosure to ensure adherence to regulatory requirements;
- ensures that the material is duly verified by the Board/Executive Chairman/Group Managing Director/Chief Financial Officer;
- ensures the information is disclosed in a timely manner as prescribed by regulations;
- maintain accurate records pertaining to all disclosures made; and
- is constantly updated on developing material information in relation to QL.

The level of autonomy for the designated spokesperson is a matter for deliberation of the Board as a whole.

Market rumours

It is the policy of QL to clarify/ confirm or deny any circulating market rumours upon becoming aware of the presence of any material information. Any clarification will be made through an immediate announcement to the Exchange, for the purpose of dissemination to the investing public.

Unusual Market Activity

QL shall carry out an enquiry to ascertain the cause of any unusual market activity in its securities. In the case of any misinterpretations, clarification shall be provided via the appropriate channels in the Exchange.

Insider Trading

The Company affirms its awareness of the provisions of Section 188 of the Capital Markets and Services Act in regards to insider trading. Directors, Management and employees of QL and its subsidiaries shall not trade on the basis of any material information that has not been disclosed to the public.



Promotional Disclosure Activity

Guided by the principles of fairness and transparency, QL shall not participate in any form of promotional disclosure activity that may have a misleading effect on its investors or cause unwarranted activity within its securities.

Administrative matters

On an annual basis, the Company Secretary will review and assess the effectiveness of the Policy. Any requirement for amendment shall be deliberated upon by the Board and any recommendations for revisions shall be highlighted proposed for approval.

The Policy will be held in the custody of the Company Secretary of QL.