



QL Resources Berhad  
Registration No. 199701013419 (428915-X)  
*Corporate Disclosure Policy*

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## **CORPORATE DISCLOSURE POLICY**

**QL Resources Berhad and its subsidiaries**



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## 1. SCOPE OF POLICY

Pursuant to Paragraph 9.02 of the Main Market Listing Requirements (“MMLR”) of Bursa Malaysia Securities Berhad (“Bursa Securities”), a listed issuer must disclose to the public all material information necessary for informed investing and take reasonable steps to ensure that all who invest in its securities enjoy equal access to such information.

This Corporate Disclosure Policy (hereinafter referred to as the “Policy”) aims to integrate the mandatory requirements set out in the MMLR 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 Policy outlines the Company’s procedures 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, officers and employees of QL and its subsidiaries.

## 2. TIMELY DISCLOSURE IN ACCORDANCE WITH THE MMLR

QL must make immediate announcement of material information in accordance with the MMLR of Bursa Securities. Once materiality of the information has been assessed, the Company Secretary(ies) is/are responsible for the timely disclosure of the information in accordance with the disclosure obligations set out in the MMLR. Information is considered material, if it is reasonably expected to have a material effect on:

- the price, value or market activity of QL’s securities; or
- the decision of QL’s securities holders or investors in determining his course of action.

Whenever any material information is being temporarily withheld, QL is committed to ensure that 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 Chief Executive Officer, with negative confirmation<sup>1</sup> or written approval of each announcement, prior to its release;

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<sup>1</sup> 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 Executive Chairman or Group Chief Executive Officer or Director in charge of particular business pillar of QL Group shall provide his approval of the announcement before release to Bursa Securities.

### **3. DESIGNATED SPOKESPERSON**

QL shall elect the Executive Chairman, Group Chief Executive Officer and any designated personnel by the Board as the spokesperson to oversight and coordinate for 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 Chief Executive Officer/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.

### **4. MONITORING OF MARKET ACTIVITY AND MAKING OF ANNOUNCEMENTS**

During a period where information is withheld from the public, the market activity of the listed issuer's securities must be closely monitored. QL must immediately announce the information withheld to Bursa Securities in accordance with MMLR, if the following circumstances occurs:

#### **4.1 Market Rumours**

QL must make due enquiry 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 Bursa Securities, for the purpose of dissemination to the investing public.

#### **4.2 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 Bursa Securities.

#### **4.3 Insider Trading**

QL 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.



#### **4.4 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.

### **5. POLICY REVIEW**

This Policy shall be reviewed by the Board of QL periodically and at least once in every three (3) years, to ensure its relevance and effectiveness in line with QL Group's evolving business environment and administrative or operational needs.

The Policy will be held in the custody of the Corporate Secretarial department.

This Policy was reviewed by the Board of QL on 27 November 2025.