

REDPLANET[®]

REDPLANET BERHAD

REGISTRATION NO.: 201901014292 (1323620-A)

CORPORATE DISCLOSURE POLICY

1. PURPOSE

The purpose of this Policy is to establish a structured framework to ensure that the Company communicates accurately, completely, promptly, and transparently with shareholders, investors, regulators, and the public.

This Policy promotes trust, accountability, integrity, and fair access to information in all Company communications, supporting good corporate governance and responsible disclosure practices.

2. SCOPE

The Policy applies to:

- Board of Directors
- Executive Directors (Managing Director and Chief Executive Officer, GIS Group)
- All employees of the Company and its subsidiaries
- Third-party advisers, consultants, or contractors with access to material non-public information.

All personnel are required to comply with the principles and procedures outlined in this Policy, regardless of their role or seniority.

3. REGULATORY FRAMEWORK

This Policy is governed by the legal and regulatory requirements applicable to listed companies in Malaysia, including:

- Bursa Malaysia Listing Requirements (Chapter 9 – Continuing Disclosure)
- Bursa Malaysia Corporate Disclosure Guide
- Companies Act 2016
- Malaysian Code on Corporate Governance (MCCG)
- Capital Markets and Services Act 2007

The Company will comply with these requirements in all communications with shareholders, investors, regulators, and the public.

4. PRINCIPLES OF DISCLOSURE

All disclosures must adhere to the following principles:

4.1 Accuracy and Completeness

All information must be factual, balanced, and complete. Misleading or incomplete disclosure is strictly prohibited.

4.2 Timeliness

Material information must be disclosed promptly after verification to prevent selective disclosure.

4.3 Equal Access

All stakeholders must have simultaneous access to material information.

4.4 Compliance

All disclosures must comply with applicable laws, regulations, and internal policies.

4.5 Accountability

The Board and Management are responsible for disclosure integrity.

4.6 Clarity

Information must be presented in a clear, understandable manner, avoiding technical jargon or ambiguity.

5. MATERIAL INFORMATION

5.1 Definition

Material information is any information that could reasonably influence:

- The price or value of the Company's securities; or
- An investor's decision to buy, sell, or hold the Company's securities

5.2 Examples

Examples of material information include, but are not limited to:

- Financial results or significant performance changes
- Dividend declarations
- Corporate proposals, mergers, acquisitions, or disposals
- Changes in the Board of Directors or key management personnel
- Litigation, regulatory investigations, or enforcement actions
- Major contracts, projects, or business developments
- Related-party transactions

5.3 Determination of Materiality

Management shall assess materiality based on both quantitative and qualitative factors in line with Bursa Malaysia guidelines. The Executive Directors and Company Secretary are responsible for confirming materiality prior to disclosure.

6. ROLES AND RESPONSIBILITIES

6.1 Board of Directors

- Ensure overall disclosure compliance
- Approve all material announcements
- Oversee disclosure processes and adherence to this Policy

6.2 Executive Directors (Managing Director and Chief Executive Officer, GIS Group)

- Identify potential material information
- Ensure timely reporting to the Board and Company Secretary
- Participate in verification of material information prior to release

6.3 Group Chief Financial Officer

- Ensure accuracy and completeness of financial disclosures

6.4 Company Secretary

- Advise on regulatory obligations
- Coordinate preparation, verification, and submission of announcements
- Review and update this Policy periodically in consultation with the Board

6.5 Investor Relations / Corporate Communications

- Manage communications with investors, analysts, and media according to authorised protocols
- Ensure consistent messaging across all channels, including social media.

6.6 Employees and Third-Party Advisers

- Report potential material information immediately to Executive Directors or Company Secretary
- Maintain confidentiality until formal disclosure

7. AUTHORISED SPOKESPERSONS

Only the following personnel may make public statements on behalf of the Company:

- Executive Directors
- Group Chief Financial Officer
- Company Secretary
- Other individuals authorised by the Board

All inquiries from media, analysts, or the public must be redirected to these authorised spokespersons.

8. DISCLOSURE PROCEDURES

8.1 Identification

Any employee, Director, or adviser aware of potential material information must immediately report it to the Executive Directors and Company Secretary.

8.2 Verification

Material information must be verified for accuracy, completeness, and clarity prior to disclosure.

8.3 Approval

- Material announcements require Board approval.
- Routine disclosures may be approved by Executive Directors and Company Secretary within Board-authorised limits.

8.4 Release

- Announcements shall be submitted to Bursa Malaysia and published via authorised channels.
- Disclosure of material information must occur promptly, and in any event within 24 hours of verification, in accordance with Bursa Malaysia Listing Requirements.

8.5 Confidentiality

- Material information must remain confidential until formally disclosed.
- Unauthorized disclosure may result in disciplinary action, civil liability, or regulatory enforcement.

9. HANDLING RUMOURS AND MARKET SPECULATION

- 9.1 The Company shall monitor market activity and media reports to identify any rumours, speculation, or misrepresentations concerning the Company that may affect its share price or stakeholders' decisions.
- 9.2 If a rumour contains or is likely to involve material information, the Executive Directors and Company Secretary shall assess the matter promptly and determine the appropriate course of action, including the issuance of a clarification or formal announcement.
- 9.3 Any public response or communication shall be coordinated solely by authorised spokespersons in accordance with Clause 7 of this Policy.
- 9.4 Directors, employees, and advisers must not comment on rumours or speculation unless expressly authorised.

10. INSIDER TRADING AND BLACKOUT PERIODS

- 10.1 Directors, management, and employees must not trade in the Company's securities while in possession of undisclosed material information.
- 10.2 Blackout periods are observed prior to:
- The release of quarterly financial results
 - The release of annual financial statements
 - Any other period designated by the Board or Company Secretary due to material events
- 10.3 Any trading by Directors or employees during permitted periods may require pre-clearance from the Company Secretary or Board, in line with regulatory and internal requirements.
- 10.4 Breaches of insider trading rules may result in disciplinary action, civil liability, and/or regulatory enforcement.

11. TRAINING AND AWARENESS

The Company shall provide regular training to Directors, management, and employees on their disclosure obligations, handling confidential information, and compliance with insider trading rules. Training shall be conducted at least annually and upon onboarding of new personnel.

12. RECORD KEEPING

The Company shall maintain complete and accurate records of all announcements, supporting documents, approvals, and related communications for a minimum of seven years or as required by law. All records must be stored securely, with access restricted to authorised personnel, to ensure auditability, regulatory compliance, and the integrity of the Company's disclosure processes.

13. REVIEW OF THE POLICY

This Policy shall be reviewed by the Company Secretary, in consultation with the Board, to ensure ongoing relevance, compliance with applicable regulations, and alignment with corporate governance best practices. Any amendments are subject to the approval of the Board.

This Policy was adopted by the Board on 28 January 2026 and is made available on the Company's website at <https://redplanetgrp.com/>.