

ARTRONIQ BERHAD
(formerly known as Plastrade Technology Berhad)

BOARD CORPORATE DISCLOSURE POLICY



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Company No: 200201023414/591077-X

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ABBREVIATIONS

AC	-	Audit Committee
ARTRONIQ / the Company	-	Artroniq Berhad
ARTRONIQ Group	-	ARTRONIQ and its subsidiary companies
AMLR	-	ACE Market Listing Requirements
BOD or the Board	-	Board of Directors
Bursa Securities	-	Bursa Malaysia Securities Berhad
ED	-	Executive Director
HRD	-	Human Resource Department
HOD	-	Head of Department
ACP / AC Policy	-	Anti-Corruption Policy
ACSOP	-	Anti-Corruption Standard Operating Procedures
PIC	-	Person-In-Charge
MACC	-	Malaysian Anti-Corruption Commission
MCCG	-	Malaysia Code on Corporate Governance
NC	-	Nomination Committee
RC	-	Remuneration Committee

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1. Introduction

ARTRONIQ is committed to upholding high standards of transparency and promotion of investor confidence through the provision of comprehensive, relevant and quality information on a timely basis.

In adopting this policy, ARTRONIQ has taken into account the recommendations contained in the MCCG 2017, the disclosure obligations contained in the ACE Market Listing Requirements of Bursa Securities, Malaysian Anti-Corruption Commission Act 2009 (Act 694) and the Corporate Disclosure Guide issued by Bursa Securities in September 2011.

2. Rationale and Objectives

The primary objectives of ARTRONIQ's Corporate Disclosure Policy are:

- To promote and elevate standard of disclosure through the provision of timely, transparent, comprehensive, relevant and quality information;
- To promote investor confidence and to demonstrate corporate integrity;
- To ensure the veracity of the information disseminated through the exercise of due diligence in ensuring information disclosed are factual, relevant, timely and comprehensive;
- To enhance public relations with key stakeholders and to build trust and confidence;
- To ensure effective corporate disclosure procedures are in place so as to ensure the management of key corporate information are adequately safeguarded and its disclosures made are consistent, reliable, accurate and relevant for the relevant stakeholders.

3. Disclosure Structure and Responsibility

In meeting the above-mentioned objectives, ARTRONIQ has adopted the following disclosure structure as well as policies and procedures:

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BOARD CORPORATE DISCLOSURE POLICY

3 Disclosure Structure and Responsibility (Cont'd)

3.1 Corporate Disclosure Policies and Procedures (CDPP)

ARTRONIQ has adopted the following Disclosure Policies and Procedures.

- Communicating and responding to all stakeholders in respect of all information relating to the Group through all forms of communication channels are to be handled by designated spokesperson as outlined under 3.2 overleaf.
- The various forms of communication channels authorized for use are set out in 3.4 overleaf.

3.2 Designated Spokesperson

- i) Executive Director
- ii) Chairman of the Board
- iii) Group CEO
- iv) or in the absence of (i) and (ii), the Independent Director

3.3 Responsibility Designated Spokesperson

- Proper dissemination of relevant information in accordance with the disclosure obligations under the ACE Market Listing Requirements;
- Coordinating, overseeing and communicating material information to relevant stakeholders in accordance with the ACE Market Listing Requirements;
- Ensuring appropriate security measures are in place to maintain integrity of information disseminated.

3.4 Disclosure and Dissemination Channels

ARTRONIQ is authorised to use of a broad range of communication channels to disseminate relevant information to its stakeholders and these include:

- Electronic facilities and medium provided by Bursa Securities;
- Press releases;
- Corporate website;
- General meetings;
- Road shows;
- Corporate exhibitions;
- Analyst briefings,
- Media interviews or events, and
- Company events.

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4. Document Management

ARTRONIQ has in place a structured and streamlined document management system in place for each of its operating departments.

These documents are securely stored and where material and sensitive in nature, are restricted in its circulation and are accessible by authorised personnel only.

ARTRONIQ has put in place a secured information technology system for communication and information management purposes which is supported and maintained by an in-house IT Department.

Access to information in the IT system is secured and controlled through password protection and access restrictions.

Access to financial information and other material price sensitive information is restricted to only designated senior management personnel from the Finance & Accounts Department only. The database of the Finance & Accounts Department is not shared or accessible by any other department within the Group.

5. Restrictions, Prohibitions and Confidentiality

Only the following personnel are authorised to have access and are privileged to view sensitive and material information:

- i) members of the Board of Directors
- ii) the CFO, CFO Designate, Group Financial Controller, Group Accountant, Accounts & Finance Manager and senior executives of the Finance & Accounts Department
- iii) personnel such as company secretaries, auditors, lawyers, consultants and advisers who are authorized by personnel list in (i) and (ii) above due to their roles and responsibilities in assisting the Group

Authorised personnel who upon coming into possession of such confidential information are reminded of the following:

- To keep the information strictly confidential
- Restriction to insiders or personnel mentioned above who are in possession of unreleased material information are not allowed to trade in the Company's shares or securities, whichever applicable.
- Not to disclose to any third party on such information they come into knowledge or possession.

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6. Where Confidentiality is Compromised

In the event where the confidentiality of the information has been compromised, ARTRONIQ will take the appropriate steps to ratify the compromised information (or clarify the status with Bursa Securities) so as to eliminate or minimize the impact to the Group.

Confidentiality is deemed to have been compromised where such information is in public or third party circulation, which may be present in analyst reports, media reports or market rumours.

When ARTRONIQ becomes aware of a rumour or information leak, the Board of Directors and/or Senior Management shall determine:

- whether the rumour or report contains undisclosed material information, and
- whether immediate disclosure is required to clarify, confirm or deny the rumour or report.

As a general rule it is not ARTRONIQ's policy to respond or comment on any market rumours or speculations, unless evidence or elements of undisclosed material information are found. At that point of time, the Board shall determine the appropriate course of action to address the issue discovered.

7. Anti-Corruption

This corporate disclosure policy has been developed in line with the Group's policies on anti-corruption as well as whistle blowing, and it serves to prevent any unauthorised use of sensitive and material information for the purposes of private gain.

This Policy also seeks to create awareness on discerning and differentiating the authenticity and validity of information disseminated, communicated or circulated in view of the Group's stand.

8. Coverage

This Policy applies to all personnel associated the Group, including employees, customers, suppliers, agents, contractors, consultants, shareholders, partners, etc.

- END OF POLICY -