



YINSON HOLDINGS BERHAD

Corporate Disclosure

POLICY & PROCEDURE

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Revision Details

Rev. No.	Section	Details
01	All	Corporate Disclosure Policy created.
02	2, 3, 4.3, 4.4 & 5	<ul style="list-style-type: none">▪ Adoption of new template with sections - Ownership, Abbreviations & Definitions.▪ Insertion of exceptional circumstances that Yinson may withhold or delay disclosure of material information temporarily provided that complete confidentiality is maintained.▪ Insertion of measures to minimise leakage of information in ensuring Yinson maintain confidentiality at all times.▪ Insertion of policy on thorough public dissemination.
03	10, Appendix 1	Insertion of Corporate Disclosure Matrix



1 OBJECTIVE

- 1.1 Pursuant to Paragraph 9.03 (Part C) of the Main Market Listing Requirements (“MMLR”) of Bursa Malaysia Securities Berhad (“Bursa Securities”), a prescribed minimum amount of disclosure is outlined for listed issuers to adhere to. This Corporate Disclosure Policy and Procedure (“CDPP”) aims to integrate the mandatory requirements set out in the MMLR with the Recommendations promulgated by the Corporate Disclosure Guide by Bursa Securities, thus instilling the tenets of good governance practices in Yinson Holdings Berhad (“Yinson” or “Company”) in promoting Yinson disclosure principles – clarity, completeness and accuracy.
- 1.2 This CDPP sets out the determination and dissemination of sensitive and material information to investors, stakeholders, local media, the investing public and other relevant persons in line with applicable legal and regulatory requirements.
- 1.3 Scope of CDPP
- This CDPP is applicable to all Directors, Management staff, officers and employees of Yinson and its subsidiaries (“Yinson Group” or “Group”).

2 OWNERSHIP

- 2.1 Approver: Board of Directors, Yinson Holdings Berhad
- 2.2 Checker: Corporate Secretary

3 ABBREVIATIONS & DEFINITIONS

- 3.1 The Definitions below are relevant for this document.

“**Bursa Securities**” refers to Bursa Malaysia Securities Berhad

“**CDPP**” refers to Corporate Disclosure Policy and Procedure

“**CMSA**” refers to Capital Market and Services Act 2007

“**MMLR**” refers to Main Market Listing Requirements

“**Yinson**” or “**Company**” refers to Yinson Holdings Berhad

“**Yinson Group**” or “**Group**” refers to Yinson and its subsidiaries



4 TIMELY DISCLOSURE IN ACCORDANCE WITH THE MMLR

- 4.1 Immediate announcements shall be made of material information in accordance with the MMLR. Once materiality of the information has been assessed and determined, the Company Secretary/ Corporate Secretary/ Corporate Advisor shall be responsible for the timely disclosure of information in accordance with the MMLR's disclosure obligations.
- 4.2 A general guideline to determine materiality is if the information is reasonably expected to impact on:
- 4.2.1 Price, value or market activity of any of its securities; or
 - 4.2.2 Investors' decision in determining his course of action.
- 4.3 The Company may withhold or delay disclosure of material information temporarily in the following exceptional circumstances, provided that complete confidentiality is maintained.
- 4.3.1 When the facts are in the state of flux; or
 - 4.3.2 When the disclosure will prejudice the Company's ability to pursue its corporate objectives; or
 - 4.3.3 When any other regulations restricted the disclosure.
- 4.4 In relation to any material information that is being withheld temporarily, Yinson is committed to ensuring strictest confidentiality is maintained while observing the requirements pursuant to the MMLR. Yinson ensures that confidentiality is maintained at all times to minimise leakage of information by implementing the following measures:
- 4.4.1 Putting in place better document management;
 - 4.4.2 Ensuring a secured information technology system for communication and document management purpose;
 - 4.4.3 Restricting dissemination and access of information; and
 - 4.4.4 Putting in place Internal control policies on confidentiality.
- 4.5 All disclosures made shall be in a reader-friendly format allowing for easy understanding by all parties. Yinson is committed to disclosing information that is factual, clear, unambiguous, accurate, succinct, balanced, fair, sufficient and free of technical jargon.



- 4.6 Disclosure made shall adhere to the following protocol/ procedure:
- 4.6.1 All material announcements such as, corporate exercises are to be reviewed and approved by the Board. A written consent from any one of the following personnel is compulsory, prior to its release:
- i. Group Chairman;
 - ii. Group Chief Executive Officer;
 - iii. Group Chief Strategy Officer; or
 - iv. Group Chief Financial Officer.
- 4.6.2 Any relevant parties referenced in the announcement should also review the announcement prior to its release, to confirm the accuracy of the information; and
- 4.6.3 Save as material announcements, all other announcements (including PDF submission), shall obtain written consent from any one of the following personnel, prior to its release:
- i. Group Chairman;
 - ii. Group Chief Executive Officer;
 - iii. Group Chief Strategy Officer;
 - iv. Group Chief Financial Officer/ Group Financial Controller; or
 - v. Company Secretary/ Corporate Secretary.
- 4.6.4 Upon received of the confirmation from Bursa Link on the published announcement, the same announcement shall be uploaded to Yinson website.
- 4.7 The Company shall elect a spokesperson to be responsible for the oversight and coordination of the disclosure of material information to the markets. The level of autonomy for the designated spokesperson is a matter for deliberation of the Board, as a whole. The duties of the spokesperson shall include but not limited to the following:
- 4.7.1 Creating awareness amongst Directors, Management and employees of the Group on the importance of timely disclosures;
 - 4.7.2 Reviewing the materiality criteria for disclosure to ensure adherence to regulatory requirements;
 - 4.7.3 Ensuring that the materiality criteria are duly verified by the Board, Group Chief Executive Officer, Group Chief Strategy Officer, Group Chief Financial Officer and/ or Group Financial Controller;
 - 4.7.4 Ensuring the information is disclosed in a timely manner as prescribed by regulations;
 - 4.7.5 Maintaining accurate records pertaining to all disclosures made; and
 - 4.7.6 Constantly being updated on changes to regulatory requirements on corporate disclosure in relation to Yinson Group.



5 THROUGH PUBLIC DISSEMINATION

- 5.1 Yinson leverages on information technology for broader public dissemination of material information on announcement in Bursa Securities and simultaneous availability of that information on Yinson website. The Company promotes equal accessibility and strictly prohibits the disclosure of material non-public information to a selected individual or group of people.

6 MARKET RUMOURS

- 6.1 It is the policy of Yinson to clarify, confirm or deny any circulating market rumours upon becoming aware of the presence of any rumour or report, true or false, that contains material information. Any clarification provided shall be in a published format, for the purpose of dissemination to the public.

7 UNUSUAL MARKET ACTIVITY

- 7.1 Yinson shall carry out due 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.

8 PROMOTIONAL DISCLOSURE ACTIVITY

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

9 INSIDER TRADING

- 9.1 The Company affirms its awareness of the provisions of Section 188 of the Capital Markets and Services Act 2007 (amended 2012) (“**CMSA**”) on insider trading. Directors, Management and employees of the Group must not trade on the basis of any material information that has not been disclosed to the public.

10 CORPORATE DISCLOSURE MATRIX

- 10.1 The Company adopts Corporate Disclosure Matrix as set out in the Appendix 1 below in determining what kind of events/ transactions and how such information shall be disclosed to stakeholders.
- 10.2 Self-check form with link <https://forms.office.com/r/4T0pyx4jc> is developed on MS365-forms as a corporate disclosure tool to assess disclosure requirements.



11 GOVERNANCE ON CDPP

- 11.1 The Board is responsible to formulate and endorse this CDPP with assistance from Investor Relations/ Corporate Secretary Department.
- 11.2 This CDPP shall be held in the custody of the Corporate Secretary and shall be reviewed periodically or as and when required. Recommendation shall be made to the Board for approval, and revisions uploaded to Yinson website and other channels, as appropriate.



Appendix 1

No.	Event/ Transaction (non-exhaustive)	Material	Press Release	Press Release via Bursa Link	Bursa Announcement	Notes
1.	Collaboration agreements including Head of Agreement (HOA), Memorandum of Understanding (MOU), Partnership, Joint development, Exclusivity etc. - Non-binding	No	Optional	No	No	
	- Binding	No Yes	Optional Yes	Optional No	No Yes	For announced MOU, quarterly update announcements are required until the MOU materialized or ends of its tenure.
2.	Consortium for bidding – Pre-bid JV agreement	No	Optional	No	No	To include clauses in agreement that formation of JV conditional on award of project
	Execution of JV agreement/ Formation of JV	No Yes	Optional Yes	No Optional	No Yes	Aggregation rule applies (rolling 12 months)
3.	Provision of financial assistance - Subsidiary, JV or Associate companies	Yes*	No	No	Yes	* 5% or more of NTA required shareholders' approval unless necessary to facilitate ordinary course of business.
	- 3 rd Party (only if necessary to facilitate ordinary course of business)	Yes/ No	No	No	Yes	For provision of financial assistance to 3 rd party which is necessary to facilitate ordinary course of business, quarterly update announcements are required until full repaid.
4.	Investment – Acquisition/ Disposal	No	Optional	No	No	Aggregation rule applies (rolling 12 months)
		Yes	Optional	No	Yes	



Appendix 1 (cont'd)

No.	Event/ Transaction (non-exhaustive)	Material	Press Release	Press Release via Bursa Link	Bursa Announcement	Notes
5.	Related Party Transaction (RPT) with ratios $\geq 0.25\%$ (rolling 12 months)	Yes	No	No	Yes	
	If RPT < MYR500,000	No	No	No	No	
6.	Refinancing exercises/ Secured Project Financing/ Release of guarantee for financing	Yes/ No	Optional	No	No	
7.	Dilution of stake in Investment	No	Optional	No	No	Aggregation rule applies (rolling 12 months)
		Yes	Optional	No	Yes	
8.	Increase in valuation of investment	No	Optional	No	No	Valuation marked to latest round of funding
		Yes	Optional	No	No	
9.	Issuance of new financial instrument requiring Securities Commission's approval	Yes	Yes	No	Yes	
10.	Secured development rights or permits	Yes/ No	Optional	No	No	
11.	Product launch/ development milestone	No	Optional	No	No	
12.	Securing project/ contract	No	Optional	No	No	
		Yes	Yes	No	Yes	
13.	Loss of licence/ permit	No	No	No	No	
		Yes	Yes	No	Yes	
14.	Material adverse event	Yes	Optional	No	Yes	
15.	Clarification of untrue report	Yes/ No	Optional	No	No	Refer Stakeholders Communication Policy & Procedure