



# **PRESS METAL ALUMINIUM HOLDINGS BERHAD**

Registration No. 201601027232 (1198171-H)

## **INSIDER DEALING POLICY**

Abbreviation	Meaning
AC	: Audit Committee of the Company
Board	: The Board of Directors of the Company
CMSA	: Capital Markets and Services Act 2007
COC	: Code of Conduct
COE	: Code of Ethics
Director	: Includes all independent and non-independent directors, executive and non-executive directors of the Group and shall also include alternate or substitute directors.
Employees	: All individuals directly contracted to the Group on an employment basis, including permanent and temporary employees excluding Directors and Management.
Group	: The Company and its subsidiaries, collectively.
Information	<p>Information under Section 183 of the CMSA includes:</p> <ul style="list-style-type: none"> <li>(a) matters of supposition and other matters that are insufficiently definite to warrant being made known to the public;</li> <li>(b) matters relating to the intentions, or likely intentions, of a person;</li> <li>(c) matters relating to negotiations or proposals with respect to commercial dealings or dealing in securities;</li> <li>(d) information relating to the financial performance of a corporation;</li> <li>(e) information that a person proposes to enter into, or has previously entered into one or more transactions or agreements in relation to securities or has prepared or proposes to issue a statement relating to such securities; and</li> <li>(f) matters relating to the future.</li> </ul>
Insider	<p>The person or members of their immediate families, and members of their households who possesses Price-Sensitive Information belonging to the Group that is not generally available which on becoming generally available a reasonable person would expect it to have a material effect on the price or the value of securities; and knows or ought reasonably to know that the information is not generally available.</p>
Officer	: All Directors, Management and employees of the Group

<b>Abbreviation</b>	<b>Meaning</b>
PMAH or the Company	: Press Metal Aluminium Holdings Berhad (Registration No. 201601027232 (1198171-H)).
Price-Sensitive Information	Material information when generally available would or would tend to have a material effect on the price or value of Securities
Securities	Securities means: (a) Shares in or debentures of the Company; and (b) Any right (such warrants), option or interest in respect thereof.
Subsidiary	: A corporation in which the Company controls the composition of the board of directors, controls more than half of the voting power or holds more than half of the issued share capital excluding preference shares.

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## **1. Introduction**

The Board has adopted this Insider Dealing Policy which is intended for the Group.

Insider dealing or trading is defined as the purchase or sale of the Securities effected by or on behalf of a person with knowledge of relevant but non-public material information regarding the Company's Securities. The insider is in a position to make massive gains by selling or buying securities before information that might affect the price of the Company's Securities (price-sensitive information) is made public.

There are three (3) elements that need to be fulfilled to constitute insider dealing:

- (a) The trading is effected pursuant to knowledge of relevant but non-public material "Information" regarding the Company;
- (b) The trading is effected by an "Insider";
- (c) The effect of that "Information" is that when it is made available to the public, it will affect the price or volume of the Company's Securities.

## **2. Objectives**

This Policy aims to:-

- (a) Prevent insider dealing of Securities;
- (b) Ensure transparency and fairness in dealing with all stakeholders of the Group;
- (c) Maintain the confidentiality of Price-Sensitive information; and
- (d) Adherence to the CMSA.

## **3. Scope**

This Policy applies to all transactions in the Company's Securities may issue from time to time.

It applies to all Officers and Insiders.

A fact is considered "price-sensitive" if information that "on becoming generally available would or would tend to have a material effect on the price or value of securities" as referred to in Section 185 of the CMSA. In other words, there is a substantial likelihood that a reasonable investor would consider it important in making a decision to buy, sell or hold a security or where the fact is likely to have a significant effect on the market price of the security.

Information is still considered a Price-Sensitive Information if the information had not been broadly disseminated to the public for sufficient period to be reflected in the price of the security.

This Policy also applies to any person who receives Price-Sensitive Information from any Insiders.

Any person who possesses Price-Sensitive Information regarding the Group is an Insider for so long as the information is not publicly known. Any employee can be an Insider from time to time and would at those times be subject to this Policy.

#### **4. Prohibition**

CMSA prohibits an Insider in possession of certain Information to:

- (a) acquire, dispose of, or procure, directly or indirectly, or enter into an agreement for or with a view to the acquisition or disposal of the Company's securities;
- (b) encourage or discourage other persons to deal in any Company's securities or exercise any options or other rights over such securities; and
- (c) disclose directly or indirectly, whether through the form of electronic or manual, to any person who do not need such information to discharge their duties.

Any person who commits insider trading may be subjected to certain criminal and civil actions under Malaysian Law which includes CMSA.

#### **5. Exception**

The exceptions to this Policy are:

- (a) The concerned person does not have any access or has not received any information up to the time of signing the undertaking;
- (b) The concerned person has made a full and true disclosure in the matter and has gained approval from the Company and the relevant authorities; and
- (c) Any other exceptions stated in CMSA.

#### **6. Reporting and Disclosures**

- (a) The Company shall disclose the Information to the relevant authorities if deemed necessary.
- (b) All Officers are required to disclose the details of their securities transactions to the Group or any relevant authorities if deemed necessary or requested to do so.

#### **7. Periodic Review**

This policy shall be reviewed periodically and may be amended by the Board as it deems appropriate.

*This policy was first adopted by the Board on 26 February 2019 and was reviewed and approved by the Board on 26 November 2020.*