

## LIKEI LOGISTIC SERVICES BERHAD

Registration No. 202101036465 (1436765-X)  
(Incorporated in Malaysia)

### CORPORATE DISCLOSURE POLICY AND PROCEDURES

#### 1. INTRODUCTION

This Corporate Disclosure Policy and Procedures ("**Policy**") applies to all Directors, key senior management and employees of LIKEI LOGISTIC SERVICES BERHAD ("**the Company**") and its subsidiaries ("**the Group**").

The Group is committed to provide accurate, comprehensive, quality and timely disclosure of material information pertaining to the Group's operations, financial condition and future prospects in accordance with the Malaysian Code on Corporate Governance and the ACE Market Listing Requirements ("**ACE LR**") of Bursa Malaysia Securities Berhad ("**Bursa Securities**"), as well as all other applicable legal and regulatory requirements and guidelines, to its shareholders, stakeholders and investors.

#### 2. OBJECTIVES

This Policy is established to ensure a consistent, transparent, and compliant approach toward the determination and dissemination of material information, maintaining confidentiality where necessary, and preventing insider trading. It also provides guidelines in order to achieve consistent disclosure practices across the Group. The objectives of this Policy are as follows:-

- i) to raise awareness and provide guidance to the Board of Directors ("**Board**"), key senior management and employees on applicable disclosure requirements and standards;
- ii) to establish effective procedures for management of information with clear accountability for the disclosure of material information;
- iii) to build and maintain strong investor relations by fostering transparency, trust, good governance and credibility through consistent and effective communication;
- iv) to protect and prevent the improper use or disclosure of Company's confidential and material information; and
- v) to build good investor relations with the investing public that inspires trust and confidence.

This Policy does not cover the disclosure of:-

- i) Information that is not generated or owned by the Company or its subsidiaries (e.g., third-party research, news articles, or analyst reports);
- ii) Information that is already in the public domain and widely accessible to the general public; and
- iii) Information that is derived, summarised, or interpreted from public domain data (e.g., financial ratios or market analysis based on published financial statements).

### 3. APPLICABILITY AND COMPLIANCE

#### 3.1 Applicability

This Policy covers all disclosure to be made by the Group, including but not limited to:-

- i) documents filed with, and announcement made to the regulators or authorities, written statements, annual reports, quarterly reports, news releases, letters to shareholders, e-mail communication and information published on the Company's website; and
- ii) oral statements made in group and individual meetings, telephone conversations, media interviews and press conferences.

#### 3.2 Compliance

All employees are responsible for familiarising with and adhering to this Policy. Any violation may result in disciplinary action, including possible termination of employment, and may also contravene applicable laws and regulations. In cases involving Directors or officers, the Group reserves the right to report the matter to the relevant regulatory authorities and professional bodies.

### 4. STRUCTURE & CONTROL FOR CORPORATE DISCLOSURE

#### 4.1 Authorised Personnel

4.1.1 The Board holds the ultimate responsibility for ensuring that the Group's disclosure requirements are fulfilled. The Board may delegate the implementation and adherence of this Policy to the Chief Executive Officer ("CEO").

4.1.2 The CEO is responsible to the following, among others:-

- a) creating and maintaining awareness and understanding of the disclosure requirements;
- b) ascertaining whether corporate developments, transactions and other events constitute material information, and if so, ensuring the procedures outlined in this Policy are fully adhered to;
- c) ensure timely, complete and accurate disclosure of material information or event in accordance with ACE LR of Bursa Securities;
- d) implementing and monitoring of compliance with the Policy and undertaking reviews of any violations, including assessment and implementation of appropriate consequences and remedial actions; and
- e) periodically reviewing and updating this Policy from time to time to ensure compliance with the ACE LR of Bursa Securities and other applicable requirements.

#### 4.2 Authorised Spokesperson

4.2.1 The Board has the overall responsibility of overseeing and co-ordinating the disclosure of material information for the Group's business, as well as approving financial statements and major developments.

4.2.2 The authorised spokespersons for the Company are the Chairman of the Board and the CEO.

4.2.3 Authorised spokespersons must not disclose any material information that has not been previously made public. They may, from time to time, designate other individuals to speak on behalf of the Group or to respond to specific inquiries from the investment community or media.

- 4.2.4 No employees, other than those authorised, may respond to enquiries from the investment community or media. All such enquiries should be directed to the designated spokespersons.
- 4.2.5 If there is any doubt about the appropriateness of supplying information to an outside party, employees should seek guidance from the authorised spokespersons.
- 4.2.6 This Policy does not restrict employees from engaging with external parties for legitimate business purposes. However, all shared information must comply with this Policy and employees should consult an authorised spokesperson when in doubt.

## 5. SCOPE OF THE CORPORATE DISCLOSURE

The principal scope of corporate disclosure include:-

- i) Immediate disclosure of material information
- ii) Periodic disclosures
- iii) Comprehensive public dissemination
- iv) Clarification, confirmation or denial of rumours or reports
- v) Response to unusual market activity
- vi) Unwarranted promotional disclosure activity
- vii) Insider trading
- viii) Disclosures during closed periods
- ix) Disclosure of forward-looking information
- x) Correction of misrepresented or inaccurate information

The guidance on corporate disclosure for the above principal scope is provided under the following Clauses 5.1 to 5.7 of this Policy.

### 5.1 Immediate Disclosure of Material Information

#### 5.1.1 Disclosure of Material Information

- i) Material information is any information which is expected to have a material effect on the following:-
  - a) the price, value or market activity of any of the securities of the Company; or
  - b) the decision of a holder of securities or an investor in determining his choice of action, and may include information which –
    - concerns the Group's assets and liabilities, business, financial condition or prospects;
    - relates to any material contract or proposed corporate exercises that will materially affect the Group's financial position and valuation;
    - relates to major disputes or dealings with employees, suppliers, customers and others;
    - relates to any events affecting the present or potential dilution of the rights or interests of the Company's securities; or

- relates to any event materially affecting the size of the public holding of its securities.
- ii) The following guidelines will be followed by the Company to fulfil its obligation to make immediate announcement of material information:-
- a) for the prescribed events as set out in Rule 9.19 of the ACE LR of Bursa Securities, the Company will immediately announce the event upon its occurrence;
  - b) where the materiality for an event or transaction can be quantified, the decision on materiality will be in accordance with the threshold of the percentage ratio as set out under the ACE LR of Bursa Securities. An announcement will be made if the transaction triggers the prescribed percentage ratio applicable for that type of transaction; and
  - c) where the materiality for an event or transaction cannot be quantified, the Company will undertake a materiality assessment of the information before making an announcement. In making the assessment of whether an event of information is material for the purpose of an announcement, the Company will:-
    - take into account the relevant factors as follows: the anticipated impact of the information on the Group's entire scope of activities;
    - the anticipated impact of the information on the Group's financial position or performance; or
    - the relevance of the information on the factors that determine the price of the listed securities of the Company.

#### 5.1.2 Responsibilities and Procedures on Disclosure of Material Information

- i) An announcement to Bursa Securities will be prepared and/or reviewed by the Company Secretary or Chief Financial Officer ("**CFO**") or the appointed adviser and approved by the CEO.
- ii) The CFO will review and validate all financial data contained in the announcement to ensure that disclosures are consistent with the prevailing accounting standards.
- iii) The Company Secretary or the appointed adviser shall release the announcement to Bursa Securities once the announcement is approved.
- iv) After the release of the announcement to Bursa Securities, the announcement will be made available on the Company's website.

#### 5.1.3 Withholding and Maintaining Confidentiality of Material Information

- i) There are exceptional circumstances when the Company can withhold or delay disclosure of material information temporarily, provided that the strictest confidentiality is maintained. The exceptional circumstances where disclosure may be temporarily withheld are as follows:
  - a) when immediate disclosure will prejudice the ability of the Group to pursue its corporate objectives;
  - b) when the facts are in a state of flux; or
  - c) where laws prohibit the disclosure of such information.

- ii) If the material information is being withheld, pursuant to the ACE LR, the Company must ensure that the strictest confidentiality is maintained by limiting the number of people with access to the material information and ensuring the security of all confidential documents in accordance to internal control policies on confidentiality.
- iii) The Company will immediately announce the information withheld to Bursa Securities in accordance with the ACE LR, if the following circumstances occurs:
  - a) unusual market activity in the Company's securities which signifies that a "leak" of the information may have occurred;
  - b) rumours or reports concerning the information have appeared; or
  - c) where the Company learns that there are signs that insider trading may be taking place.

## 5.2 Periodic Disclosures

### 5.2.1 Quarterly Report

An interim financial report that is prepared on a quarterly basis ("**Quarterly Report**") must be announced to Bursa Securities as soon as the figures are approved by the Board and in any event not later than two (2) months after the end of each quarter of a financial year. The Quarterly Report must include the information as stipulated in the ACE LR.

### 5.2.2 Annual Report

The Company must issue its annual report that include the annual audited financial statements on a consolidated basis together with the auditors' and directors' reports of the Company, and forward them to Bursa Securities and shareholders not later than four (4) months from the close of the financial year end of the Company.

## 5.3 Thorough Public Dissemination

### 5.3.1 Equal Access to Material Information

- i) The Company shall release material information to the public in a manner designed to obtain its fullest possible public dissemination.
- ii) No disclosure of material information is made on an individual or selective basis to journalists, analysts, fund managers or other persons unless such information has previously been fully disclosed and disseminated to the public.
- iii) Any public disclosure of material information must be made by an announcement first to Bursa Securities or simultaneously to Bursa Securities, the press and the newswire services.

### 5.3.2 Communicating with Journalists, Analysts and Fund Managers

- i) The Company may provide information relating to the business, operations or financial performance of the Company and/or Group to the journalists, analysts and/or fund managers provided that such information is not undisclosed material information.
- ii) Similarly, when responding to questions from journalists, analysts and fund managers, or when commenting on their reports, the Company can provide any information, as long as it does not include any undisclosed material information.

- iii) In the event that the non-public material information has been inadvertently disclosed when responding to questions or commenting on the reports, the Company shall immediately announce to Bursa Securities.

### 5.3.3 Corporate Website

- i) The Company has a website which acts as a channel to disseminate information and to allow access to information about the Group by the shareholders and public. The website also distinguishes an “Investor Relations” section containing disclosure and information of interest to the investors.
- ii) The contents of the “Investor Relations” section of the website shall include but not limited to the following:-
  - a) announcement to Bursa Securities including periodic financial statements, annual reports and circulars to shareholders;
  - b) financial summary;
  - c) general meetings, reports and minutes; and
  - d) information which may be relevant and useful to the shareholders.

Besides that, the website also contains the email address, names of the designated persons and their contact numbers to enable the public to forward queries to the Company.

## 5.4 Clarification, Confirmation or Denial of Rumours or Reports

- 5.4.1 Whenever the Company becomes aware of a rumour or report (true or false) that contains material information, the Company will make due enquiry and immediately publicly clarify, confirm or deny the rumour or report circulated by any means including by word-of-mouth, an article published in a newspaper, newswire, magazine, a broker’s market report or any other publication.
- 5.4.2 The Company will respond to a rumour or report by making an announcement to Bursa Securities which should contain sufficient facts to support the clarification, confirmation or denial of the rumour or report.
- 5.4.3 Any follow-up notifications to the regulatory authorities will be circulated to the Board, if deemed necessary.

## 5.5 Response to Unusual Market Activity (“UMA”)

- 5.5.1 Where unusual trading activity, price movement, or both occurs on the securities of the Company, the Company will immediately undertake a due enquiry to seek the cause of the UMA.
- 5.5.2 If the Company determines that the UMA results from material information that has already been publicly disclosed pursuant to the ACE LR, no further announcement is required. However, if the UMA indicates that such material information may have been misinterpreted, the Company will issue a clarifying announcement to the Bursa Securities. Appropriate measures will be taken to inform the Board, if deemed necessary, on such further clarifications.
- 5.5.3 If the UMA results from a “leak” of previously undisclosed information, the Company will publicly disclose the information in question in accordance with the ACE LR.
- 5.5.4 If the cause of the UMA cannot be determined, the Company will announce that there have been no undisclosed developments which would account for the UMA.

## 5.6 Unwarranted Promotional Disclosure Activity

5.6.1 The Company will refrain from any form of promotional disclosure activity which may mislead investors or cause unwarranted price movement and trading activity in the Company's securities. Such activity includes news releases, public announcements, predictions, reports or advertisements, which are unjustifiable, exaggerated, flamboyant, overstated or over-zealous.

## 5.7 Insider Trading

5.7.1 Pursuant to the Capital Markets and Services Act 2007 ("CMSA"), a person is an "insider" if that person:-

- i) possesses information 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 value of the securities; and
- ii) knows or ought reasonably to know that the information is not generally available.

5.7.2 The restriction of insider trading is governed by Section 188 of CMSA and Rule 9.14 and 9.15 of the ACE LR. An insider must not:

- i) acquire or dispose of the securities of the Company, or enter into an arrangement for or with a view to the acquisition or disposal of the securities of the Company, on the basis of the material information which is not known to the investing public;
- ii) procure, directly or indirectly, an acquisition or disposal of, or the entering into an agreement for or with a view to the acquisition or disposal of the securities of the Company, on the basis of the material information which is not known to the investing public; or
- iii) inform or tip any other person of undisclosed material information unless the sharing of that information is in the necessary course of business.

5.7.3 Directors, key senior management and employees of the Group who possess undisclosed material information are prohibited from dealing directly or indirectly in the Company's securities unless the information has been publicly disclosed at least one (1) full market day from the date of the announcement of material information.

## 5.8 Disclosures during closed periods

For the purpose of this Policy, "Closed Period" refers to the period commencing thirty (30) calendar days before the targeted date of announcement, up to the date of the announcement of the Company's quarterly financial results to Bursa Securities, as defined under the ACE LR.

During the Closed Period, authorised spokespersons are strictly prohibited from commenting on the Group's current period earnings estimates, financial results, or financial assumptions beyond referring to information that has already been publicly disclosed. Communications during this period must be limited to publicly available or non-material information.

The authorised spokespersons must refrain from initiating any meetings or calls with investment analysts, shareholders, potential investors, or members of the media on matters that may be considered material or price-sensitive. However, responses to unsolicited enquiries concerning factual or publicly disclosed information are permitted.

The Group may continue to participate in investment meetings, conferences, or briefings hosted by third parties during the Closed Period, provided that no undisclosed material information is selectively disclosed. All disclosures must comply with this Policy and the ACE LR.

## 5.9 Disclosure of forward-looking information

In accordance with the ACE LR, the Company shall disclose forward-looking statement in the Management Discussion and Analysis section of its Annual Report to provide shareholders and stakeholders with meaningful insights into the Group's future prospects and strategic direction, and at a minimum, shall address the following areas:

- (i) the Group's possible trend, outlook and sustainability of each of its principal business segments;
- (ii) prospects of new businesses or investments; and
- (iii) dividend or distribution policy, if any, and factors contributing to the dividend or distribution for the financial year.

The Company shall also disclose:

- (a) the key assumptions applied in formulating these future prospects; and
- (b) the rationale or basis for these assumptions.

All relevant factors that could affect each business segment should be discussed and disclosed in clear and narrative form. The disclosure shall be fair, balanced and realistic. Both positive and negative factors affecting the Group's performance should be addressed to ensure that shareholders and investors are not misled by an over-optimistic or overly pessimistic view. Where applicable, the Company shall also highlight any material business, financial, or operational risks that may affect the realisation of the stated forward-looking statements or prospects.

## 5.10 Correction of misrepresented or inaccurate information

In the event that any Directors, key senior management, or employee becomes aware that information previously disclosed by the Company may be materially inaccurate, misleading, or contains a misrepresentation, such matter must be reported to the CEO immediately.

Upon notification, the CEO shall promptly initiate a reasonable investigation to assess the accuracy and completeness of the information in question. If it is determined that a correction is necessary, the CEO shall ensure that the revised information is disclosed to Bursa Securities and the investing public without delay and in full compliance with the ACE LR and any other applicable laws or regulations.

## REVIEW OF THE POLICY

This Policy will be periodically reviewed by the Board to ensure that it remains current and effective in accordance with the needs of the Company and any new regulations that may have an impact on the disclosure obligations and practices. Any subsequent amendment to the Policy can only be approved by the Board.

This Policy is made available for reference in the Company's website.

This Corporate Disclosure Policy and Procedures was approved by the Board on 12 August 2025.