
	<b>ROSADO TRADELINE SDN BHD</b>	<b>Doc. No.</b>	<b>RT-G006</b>
	<b>CORPORATE DISCLOSURE</b>	<b>Rev. No.</b>	<b>-</b>
<b>Eff. Date</b>		<b>01/10/2025</b>	

RT-G006  
**CORPORATE  
DISCLOSURE**

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**REVISION HISTORY**

Rev No.	Effective Date	Affected Section	Change Descriptions
00	01/10/2025	Nil	Initial Release

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## 1.0 INTRODUCTION

The Company is committed to providing accurate, clear, balanced, timely and complete disclosure of material information regarding its performance and operations to the shareholders, investors and the general public. The Company ensures equal access to such information to prevent individual or selective disclosure.

This policy is formulated in accordance with the Malaysian Code on Corporate Governance (“**MCCG**”), the ACE Market Listing Requirements (“**Listing Requirements**”) of Bursa Malaysia Securities Berhad (“**Bursa Securities**”) and Bursa Malaysia Corporate Disclosure Guide.

## 2.0 OBJECTIVES

The key objectives of this Policy are as follows:

- (a) To raise awareness and provide guidance to the Board of Directors (“**Board**”) and employees of the Company and its subsidiaries (“**the Group**”) regarding their disclosure obligations and practices;
- (b) To establish policies and guidelines for the dissemination of information to the shareholders, investors and the general public;
- (c) To ensure compliance with all applicable legal and regulatory requirements in relation to the disclosure of material information; and
- (d) To foster and maintain good investor relations with the investing public thereby promoting trust and confidence.

## 3.0 SCOPE

This Policy applies to the Directors and employees of the Group. It outlines the approach to determining and disseminating material information.


## 4.0 ADMINISTRATION OF POLICY

4.1 The Board holds ultimately responsibility for the implementation of this Policy and for ensuring that all disclosure requirements are met. The Board delegates the oversight and execution of the Group’s disclosure controls, procedures and practices to the Disclosure Committee which comprises:

- (a) Managing Director (“**MD**”);
- (b) Chief Operating Officer;
- (c) Chief Financial Officer (“**CFO**”); and
- (d) Chief Corporate Officer.

4.2 The Disclosure Committee shall be responsible for, among others, the following:

- (a) maintain awareness, understanding and keeping up to date on the governing disclosure requirements;

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- (b) Assessing the materiality of the corporate development, transactions and other events, as well as ensuring that the procedures outlined in the Policy are implemented and adhered to.
- (c) Develop, implement and monitor compliance with the policy, and periodic review of this Policy from time to time to ensure adherence to regulatory requirements.

## 5.0 AUTHORISED SPOKESPERSONS


- 5.1 The Company designates the following specific spokespersons (“**Authorised Spokesperson**”) who are responsible for communicating with the shareholders, the investing community, regulators, media and the general public:
- (a) Chairman of the Board (“**Chairman**”);
  - (b) Managing Director (“**MD**”);
  - (c) Chief Operating Officer (“**COO**”);
  - (d) Chief Financial Officer (“**CFO**”); and
  - (e) Head of Corporate Affairs (“**HCA**”).
- 5.2 The Authorised Spokesperson are authorised to communicate with all audience groups by providing information, data and analysis as well as responding to questions concerning all aspects of the Group’s operations, financial position, future prospects and strategies. They may also discuss matters relating to the Group’s corporate vision, governance, developments, initiatives and operational matters.
- 5.3 All external inquiries shall be referred to the Authorised Spokesperson. Employees other than the Authorised Spokesperson are not permitted to respond to such external inquiries.

## 6.0 CONFIDENTIALITY

- 6.1 Employees privy to confidential corporate information are prohibited from disclosing such information to anyone, unless:
- (a) it is necessary in the course of business;
  - (b) it is required by law or authorities; or
  - (c) it is authorised by the Disclosure Committee.

Access to confidential information is limited strictly to those on a “need to know” basis.

- 6.2 The following general procedures should be adhered to by all employees at all times:
- (a) Access - All documents and files containing confidential information must be kept in a secure location or within the Group’s secured information technology system with access restriction.
  - (b) Discussion - Confidential matters should not be discussed in public areas or places where conversations may be overheard such as hallways, restaurant, taxis and ride sharing vehicles. If urgent or necessary, employees are advised to exercise caution and relocate to a less crowded area.

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- (c) Reading in public areas - Employees should exercise caution when reading confidential documents on smart phones, tablets or other personal digital devices in public places.
- (d) Visitors - Visitors to the Group's premises and project sites must be accompanied by authorised Group's personnel at all times.
- (e) Social media - Employees are strictly prohibited from participating in online discussion, social media or chat groups relating to the Group's business and affairs, or listed securities.

## 7.0 DISCLOSURE PRINCIPLES

7.1 The Group, its employees and officers shall adhere to the following disclosure principles:

- (a) Immediate announcement - Subject to this Policy, material information shall be announced immediately to Bursa Securities as the first point of disclosure.
- (b) Materiality approach - The Group will apply a consistent approach in assessing the materiality of information.
- (c) Factual and complete - Disclosure must be factual, complete and not misleading. Unfavourable material information shall be disclosed in a manner consistent with favourable information.
- (d) Rumours and report - The Group does not comment on rumours unless such rumours or report have a material impact on the price of the Company's securities or affect investment decision.
- (e) Equal access - Material information shall be made equally accessible through broad public dissemination. However, consistent with market practices and subject to strict confidentiality requirements, additional information may be provided to financial institution to facilitate/obtain financial facilities.


## 8.0 DISCLOSURE PROCEDURES

8.1 Material information – In accordance with the Listing Requirements, material information refers to any information about the Group that is reasonably expected to have a material effect on:

- (a) the price, value or market activity of the Company's securities; or
- (b) the decision of the holder of securities of the Company or an investor in determining his choice of action.

8.2 Material information may include information which:

- (a) concerns the Company/Group's assets and liabilities, business, financial condition or prospects;
- (b) relates to dealings with employees, suppliers, customers and others;
- (c) relates to any event affecting the present or potential dilution of the rights or interest of the Company's securities; or

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(d) relates to any event materially affecting the size of the public holding of the Company's securities.

8.3 Any announcements to be made on Bursa Securities and where applicable, press releases, responses to public queries or media interviews ("**Public Disclosures**"), must be circulated to the Disclosure Committee for their input. All Public Disclosures shall be reviewed in accordance with the principles of this Policy and compliance with the Listing Requirements.

8.4 There may be events requiring immediate disclosure as specified in Paragraph 9.04 of the Listing Requirements, including all amendments thereto made by Bursa Securities from time to time.

8.5 In addition, the Company must immediately announce to Bursa Securities the events specified in Paragraph 9.19 of the Listing Requirements, including all amendments thereto made by Bursa Securities from time to time.

8.6 The responsibility for reporting significant corporate developments are as follows:

(a) It is essential that the MD and senior management remain fully informed of all Company's developments that could potentially impact the disclosure process.

(b) The MD is responsible for keeping the Board fully apprised of all significant developments within the Company and Group so that:

- Facilitate the determination of the materiality appropriateness and timing of public disclosure of such information, or to decide whether the information should remain confidential;
- Ensure appropriate understanding of significant developments and updates which may be relevant to ongoing communication with the investing community; and
- Avoid denial of significant developments if such developments are indeed occurring.

8.7 The responsibility and procedures for disclosing material information are as follows:

(a) The Company Secretary, Finance Department or the appointed adviser shall draft the announcement to ensure compliance with the Listing Requirements. The Finance Department is responsible for reviewing and verifying the accuracy of the financial information contained in the announcement.

(b) All announcements will be circulated to the Board of Directors for comments and approval.


(c) Following the Board's approval, signed authorisation by the MD or any designated persons shall be obtained before the announcement is released.

(d) Announcements intended for the media will be issued by the HCA. The HCA holds the overall responsibility for ensuring that material information conveyed through news or press releases is communicated clearly and effectively to the general public.

(e) After the announcement has been released to Bursa Securities, such announcement will be made available and accessible on the Company's website. The announcement may also be reproduced by newspapers, media outlets or newswire services.

(f) Upon public dissemination, the HCA will monitor the announcement or news release to ensure accurate media reporting and take corrective measures, if necessary.

8.5 In the event the Board determines that a trading halt is necessary to maintain the orderly trading of the Company's securities and having the news or material information better understood and

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widely disseminated, the Company may request Bursa Securities to suspend trading of the Company's securities to facilitate the issuance of an announcement.

## 9.0 WITHHOLDING OF CONFIDENTIAL INFORMATION


- 9.1 The Company may, in exceptional circumstances, temporarily refrain from publicly disclosing the material information provided that complete confidentiality is maintained.
- 9.2 The Company will only temporarily withhold the announcement of material information:
- When immediate disclosure would prejudice the Company's ability to pursue its corporate objectives;
  - When the facts are in a state of flux and a more appropriate moment for disclosure is imminent; and
  - Where the company or securities laws restrict such disclosure.
- 9.3 If material information is withheld, pursuant to the Listing Requirements, the Company must ensure the strictest confidentiality is maintained. This includes limiting access to the material information to only essential personnel and ensuring the security of all confidential documents.
- 9.4 In the event that material information is or is reasonably believed to have been inadvertently disclosed to third parties, or where the material information has become generally available through the media or other means, the Company must immediately announce such information to Bursa Securities.

## 10.0 FORWARD LOOKING INFORMATION

- 10.1 From time to time, the Company may communicate its future direction to the public in order to assist the market to accurately value the Company's securities. The Company will discuss general trends, events, commitments and uncertainties that are reasonably expected based on historical and currently available data.
- 10.2 Documents containing forward-looking information will be accompanied by a disclaimer that cautions readers on the risks and uncertainties which could cause actual results and developments to differ materially from those anticipated in the forward-looking information.
- 10.3 When making oral representation on forward-looking information, the Authorised Spokesperson shall take reasonable care and include similar disclaimer to the same effect.

## 11.0 RESPONDING TO RUMOURS OR REPORTS


- 11.1 Should the Company become aware of any rumour or report, whether true or false, that may contain material information, the Board will consult with its directors, major shareholders and such other parties familiar with the matter to determine whether:
- (a) the rumour or report contains undisclosed material information; and
  - (b) immediate disclosure is required to clarify, confirm or deny the rumour or report.

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- 11.2 The Company shall not respond to or clarify articles or reports that are considered general in nature, unless such information has an impact on the price of its securities or affects investment decision.
- 11.3 The Board will consider whether a voluntary announcement is appropriate to clarify, confirm or deny the rumour or report if immediate disclosure is not required under the Listing Requirements.
- 11.4 In the event a respond to the rumour or report is necessary, the Company shall:
- (a) If the rumour or report contains erroneous material information that has been circulated, the Company will, if deemed necessary or appropriate, immediately issue a denial or clarification to Bursa Securities, provide sufficient facts to refute or clarify any misleading aspects of the rumour or report.
  - (b) If the rumour or report contains material information that is accurate, an announcement setting forth the relevant facts will be prepared for public release to Bursa Securities. This announcement will include, but is not limited to, an indication of the status of negotiations or corporate plans related to the rumour or report.
- 11.5 The Company shall not respond to rumours or reports predicting future sales, earnings or other quantitative data, unless such report is manifestly based on or contains erroneous information, or is wrongly attributed to the Company.

## **12.0 INSIDER TRADING**

- 12.1 Under Section 188(1) of the Capital Market & Services Act 2007 (“CMSA”), a person is an “insider” if that person:
- (a) 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 the value of the securities; and
  - (b) Knows or reasonably ought to know that the information is generally not available.
- 12.2 In addition, Section 188(2) of CMSA states that an insider shall not, whether as principal or agent, in respect of any securities to which information in subsection 188(1) relates:
- (a) Acquire or dispose of, or enter into an agreement for or with a view to the acquisition or disposal of such securities; or
  - (b) 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 such securities
- 12.3 Based on the above, these persons would include but are not limited to the following:
- (a) Directors and officers of the Group;
  - (b) Employees;
  - (c) Persons who provide business or professional services to the Group; and
  - (d) Any other person or company informed about undisclosed material information about the Group by any of the above parties.

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12.4 The persons stated above with insider knowledge of undisclosed material information, is prohibited from trading in the Company's securities until after the information has been publicly disclosed.

### 13.0 CLOSED PERIOD

13.1 The Group subscribes to the "Closed Period" as stated in the Listing Requirements, defined as a period commencing 30 calendar days before the targeted date of announcement up to the date of the announcement of the Company's quarterly results to Bursa Securities.

13.2 During the Closed Period, the Board and Authorised Spokesperson are prohibited from commenting on current period earnings estimates and financial assumptions, other than to cite or refer to existing publicly announced information. Communications must be limited to commenting on publicly available or non-material information.

13.3 All Authorised Spokesperson must also avoid initiating meetings (in person or by phone) with investment analysts, security holders, potential investors and the media on items significant to investors, other than responding to unsolicited inquiries concerning factual information.

### 14.0 INVESTOR RELATIONS

14.1 The Authorised Spokesperson may meet with analysts, institutional investors, media and other market professionals on an individual or small group basis as needed. The Authorised Spokesperson may initiate contacts and respond to their inquiries in a timely, consistent and accurate manner in accordance with this Policy.

14.2 Presentations materials may be used during such meetings by the Authorised Spokesperson. The HCA should provide an advance copy of all presentation materials to the Disclosure Committee, which will review the presentation materials, handouts and speaking notes for accuracy and consistency with other public disclosures. The Disclosure Committee will also confirm with the HCA whether the contents and remarks are acceptable from a disclosure perspective.

14.3 In addition, analysts may from time to time request the Group to review draft analysts' reports. Only the Disclosure Committee is authorised to comment on such reports. Comments will be limited to identifying publicly disclosed factual information that may impact the analyst's model and pointing out inaccuracies or omissions based on publicly available information. The Group will not attempt to influence an analyst's conclusions.

14.4 The Group will not distribute analyst's research reports externally. However, if requested, the Group may advise which analyst cover the Group, accompanied by an appropriate disclaimer stating that the views expressed in any reports, including all forward-looking information, are those of the analysts and do not reflect the views of the Group.