



TRIVE PROPERTY GROUP BERHAD
(Company No. 667845-M)

CORPORATE DISCLOSURE POLICY

DISCLOSURE STRUCTURE & RESPONSIBILITIES

- 1) The Board is responsible in ensuring that the policy is implemented effectively and disclosure requirements are fulfilled.
- 2) The Board delegates the implementation of the Policy to the Executive Directors.
- 3) The Board reviews the Policy from time to time to ensure its relevance.
- 4) The Executive Directors shall serve as the primary contact person for matters referred to in this Policy.
- 5) The responsibilities of the Executive Directors are as follows:-
 - a) to ensure timely disclosure and announcement of material information in accordance with the Main Market Listing Requirements of Bursa Securities;
 - b) to respond to any query raised by Bursa Securities; and
 - c) to implement and monitor compliance of this Policy.
- 6) The Executive Directors shall serve as the Authorised Spokespersons to speak and respond on behalf of the Company to shareholders, stakeholders and the public generally in regards to the Group's operations, financial position, prospects, strategies, products, services, management and governance.

DISCLOSURE CONTROLS & PROCEDURES

Material Information

- 1) Immediate announcements must be made of material information in accordance with the Main Market Listing Requirements of Bursa Securities.
- 2) The general guideline to determine materiality are as follows:
 - a) Any information that is reasonably expected to impact on the price, value or market activity of the Company's securities; or
 - b) Any information that is reasonably expected to impact the decision of holder of securities of the Company or an investor in determining his choice of action.

- 3) Any material information that is being withheld temporarily, the Company is committed to ensuring strictest confidentiality is maintained by limiting the number of people with access to the material information and ensuring the security of all confidential documents.

Rumours & Reports

- 1) It is the Company's policy not to respond or comment on market speculation and rumours, unless Bursa Securities requested the Company to make a statement in response to a market rumour that appeared to contain material information or may be expected to affect the price of the Company's securities or trading activities.
- 2) The Executive Directors shall make due enquiry before publicly clarify, confirm or deny the report or the rumour.
- 3) After the endorsement of the Board, the Company shall submit its response to Bursa Securities via the Bursa Link.

Unusual Market Activity

- 1) The Executive Directors shall carry out an enquiry to ascertain the cause of any unusual market activity in its securities.
- 2) After the endorsement of the Board, the Company shall submit its response regarding the unusual market activity to Bursa Securities via the Bursa Link.

Unwarranted Promotional Disclosure Activity

- 1) The Company shall not participate in any promotional disclosure activity which may have misled investors or cause unwarranted price movement and trading activity in the Company's securities.
- 2) Such activity includes news release, public announcements, predictions, reports or advertisement, which are unjustifiable, exaggerated, flamboyant, overstated or over-zealous.

Insider Trading

- 1) The Company affirms its awareness of the provisions of Section 188 of the Capital Markets and Services Act 2007 (Amended 2010) in regards to insider trading.
- 2) Directors, Management and employees of the Company and its subsidiaries shall not trade on the basis of any material information that has not been disclosed to the public.

Closed Period

- 1) Closed period is defined as a period commencing from 30 calendar days before the targetted date of announcement to Bursa Securities of the Company's quarterly results, up to the date of the announcement of the Company's quarterly results.
- 2) During closed periods, the directors are prohibited from commenting on current period earnings estimates and financial assumptions. Communication must be limited to commenting on publicly available or non-material information.

Analyst Reports

- 1) The Company recognises the important role performed by research analysts in assisting the establishment of an efficient market.
- 2) Notwithstanding the above, the Company is not responsible for, and does not endorse the analyst reports that contain commentary on the Company or any statements or opinions therein.

Industry Conferences Presentations

- 1) The Executive Directors will review all presentations, hand-out materials and speech notes to ensure accuracy and consistency with other public disclosures.
- 2) Any presentation made or hand-out materials distributed at any industry conferences or investors events by Executive Directors shall be made available on the Company's website.

Corporate Website

- 1) All the Company's publicly disclosed material information and presentations will be made available at the Company's website.
- 2) The Executive Directors are to ensure the Company's website be kept up-to-date with the Company's latest disclosures.

Confidential Information

- 1) In general, all information regarding the Group, its operations, financial condition and future prospects, should be regarded as material and price-sensitive, and must be treated as confidential unless it is already available to the public.
- 2) Access to information shall be restricted only to relevant persons who have a legitimate reason consistent with their duties or obligations to the Company or its subsidiaries.
- 3) Any employee privy to confidential information is prohibited to communicate to any other persons unless it is necessary in the course of business or required by law or authorised by the Executive Directors.
- 4) Confidential information should not be discussed in places where the discussion may be overheard and caution should be exercised when reading confidential information on smart phones or devices in public places.

Leakage and accidental disclosure

- 1) In the event of an information leakage or accidental disclosure of unpublished material information, the situation should be addressed to the Executive Directors.
- 2) If deemed necessary, the Company will make an appropriate announcement to the Bursa Securities soonest possible, which may be followed by a press release and/or other communication methods.

Procedures For Disclosures

- 1) The Company Secretary or the external adviser duly appointed by the Board shall prepare the announcement to Bursa Securities;
- 2) The Executive Directors will review and validate the information contained in the announcement;
- 3) Any one Executive Director is required to approve each announcement prior to its release unless blanket approval is given to routine announcements;
- 4) No disclosure of material information shall be made on individual or selective basis unless such information has previously been fully disclosed and disseminated to the public.

ENFORCEMENT

- 1) Any employee who violates this Policy may be cautioned or face disciplinary action which includes termination of employment with the Group.
- 2) If any of the employees of the Group has doubt as to his/her responsibilities under this Policy, he/she should seek clarification and guidance from the Executive Directors or the Management.