



LEONG HUP INTERNATIONAL BERHAD

(201401022577) (1098663-D)

Investor Relations Policy

26 NOVEMBER 2019

Leong Hup International Berhad (201401022577) (1098663-D)
Investor Relations Policy

1. INTRODUCTION

As a public listed company, Leong Hup International Berhad (“LHI”) and its subsidiaries (the “Group”) aims to fulfil its obligation to provide information about the Group, its management, operations, and financial position as well as its future prospects and hence the setting up this Investor Relations Policy. This information is directed to its shareholders, stakeholders and the general public. The aim is to fairly and accurately represent the Group so that investors and potential investors can make properly informed investment decisions, and others can have a balanced understanding of the Group and its objectives.

2. PURPOSE

This Investor Relations Policy (“Policy”) will:

- Serve as a statement to the Group’s shareholders and other stakeholders on how LHI intends to keep them informed of material developments, and maintaining effective communications with them.
- Provide a framework of processes and procedures upon which LHI can successfully implement its Investor Relations programme.

This Policy will apply to all LHI’s Board of Directors (“Board”) and employees. It is meant to serve the Group’s shareholders and stakeholders. The Appendix at the end of this document gives a list of the main types of shareholders and stakeholders.

In formulating this Policy, the Group has taken into account the recommendations contained in the Malaysian Code on Corporate Governance 2017, and its disclosure obligations contained in the Main Market Listing Requirements of Bursa Malaysia Securities Berhad (“Bursa Malaysia” or the “Exchange”) (“Listing Requirements”).

3. GENERAL PRINCIPLES

LHI strives to maintain its corporate credibility and develop investors’ confidence in the Group by practicing a structured approach on the communicating of material information. This would assist in achieving a fair market value for LHI’s securities – a benefit to both shareholders and the Group.

The Investor Relations programme, which is designed to be both of proactive and interactive, will be based on LHI’s commitment to:

- consistently report its financial results and material developments to Bursa Malaysia, its shareholders and other stakeholders in a timely, open and comprehensive manner.
- communicate only through its designated spokespersons.
- proactively address reports and rumours, so as to avoid unnecessary speculation in its securities.
- provide a balanced and reasonable access to analysts and the media to help them arrive at informed opinions of the Group, but will not seek to influence those opinions.
- meet with its major shareholders at least once in each fiscal year as part of its ongoing programme to inform, and obtain feedback on the Group.
- use its website as an additional primary communication channel.

Leong Hup International Berhad (201401022577) (1098663-D)
Investor Relations Policy

4. COMMUNICATION COMMITMENTS

LHI will make every effort to ensure that all material information concerning the Group is made as freely and widely available as possible. The Group encourages an exchange of opinion between itself and its principal stakeholders, and will organise its communications to facilitate that dialogue if necessary.

The Group's communication will be characterised by the following attributes:

Transparency: material information will be released, whether it is favourable or not, in a balanced and fair manner that is not misleading.

Consistency: all stakeholders will receive the same information, only formats may differ depending on the audience and forum.

Accuracy: information should be complete and accurate when released and any material errors will be immediately corrected and clarified.

Timeliness: material information will be released as soon as it is known, unless there are exceptional legitimate reasons to withhold, which will be no longer than absolutely necessary.

Non-selective: equality of access to material information will be achieved through broad public dissemination; no stakeholder will be given undisclosed material information in any form.

5. SPOKESPERSONS

LHI has a well-defined structure for governance and management which provides specific authority and responsibility for Policy implementation.

The designated Spokespersons are:

Primary Spokespersons:-

- Group Chairman
- Group Chief Executive Officer
- Group Chief Financial Officer

The Group Chairman, Group Chief Executive Officer and Group Chief Financial Officer have been appointed to communicate with all audience constituents, providing information, data and analysis and responding to questions concerning all aspects of the Group's operations and financial position, its future prospects and its strategies. They may also discuss matters relating to the Group's governance and management, as well as its products and services, and initiatives.

Secondary Spokespersons:-

- Country Heads
- Head of Investor Relation

Leong Hup International Berhad (201401022577) (1098663-D)
Investor Relations Policy

The Secondary Spokespersons may only communicate to audience constituents, information already in the public domain, unless they are authorised by the Primary Spokespersons to undertake broader communications.

6. MATERIAL INFORMATION

The Group will always fully comply with its disclosure obligations expressed in the Listing Requirements. The Appendix at the end of this document gives a description of the main elements which comprise material information.

In determining materiality, the Group will assess the likely effect of the information on the price of LHI's securities, which would also include a determination of whether the circumstances or events are measurable, and trigger the materiality thresholds in the methods for percentage ratio calculation as set out in the Listing Requirements.

Typically, material information concerning the Group provided in written or oral communications would include (but not limited to) the following:

- Reports and documents provided to the Exchange and other regulators;
- Materials and statements in LHI's Annual Reports, quarterly reports, press releases, letters and circulars to shareholders;
- Presentations on behalf of the Group;
- Information on LHI's Investor Relations web portal;
- Newspaper articles concerning the Group;
- Correspondence and e-mails;
- Verbal statements made to outside parties in meetings, briefings, press conferences, or during telephone conversations;
- Interviews with the media;
- Speeches given on behalf of the Group.

7. CONFIDENTIAL INFORMATION

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 in the public domain.

Employees and third parties, such as the Group's auditors, bankers, lawyers or other professional advisors who require such information to properly execute their duties, are to protect the confidentiality of such information.

Leakage and Accidental Disclosure

In the event of an information leakage, or the accidental disclosure of unpublished material information, the situation will be addressed in line with the Group's chain of authority and responsibility. If deemed necessary, the Group will make an appropriate announcement to Bursa Malaysia as soon as practicably possible, which may be followed by a press release and/or other communication modes.

Leong Hup International Berhad (201401022577) (1098663-D)
Investor Relations Policy

8. DISCLOSURE PROCESS

The Group will take the following steps in announcing material information:

Step 1: Approval is given for release of material information in line with the chain of authority and responsibility.

Step 2: On trading day, between 12.30 p.m. to 1.30 p.m. or between 5.00 p.m. to 6.30 p.m., an announcement is made to the Bursa Malaysia. If the Group chooses to disseminate the information during trading hours or after 6.30 p.m. but prior to commencement of trading on the next market day, Bursa Malaysia may be requested to temporarily suspend trading in LHI's securities to allow the information to be properly and thoroughly disseminated.

9. REPORTS AND EVENTS

Quarterly Financial Reports

Quarterly Financial Reports will be released to Bursa Malaysia upon getting approval from the Board. A copy of the Quarterly Financial Report will be posted on LHI's Investor Relations web portal, and dispatched by e-mail to relevant parties on the Group's mailing list.

Annual Report

Annual Reports will be available on LHI's Investor Relations web portal. The printed form of Annual Reports will be provided upon request by LHI's shareholders.

The Annual General Meeting

Notice of the Annual General Meeting will be released and uploaded to Bursa Malaysia and published in a daily newspaper. The Annual General Meeting is an important forum that provides the opportunity for shareholders to engage with the Board and senior management, and to gain a fuller understanding of the Group's affairs. The Group will endeavour to answer all questions raised by shareholders during the general meeting and may include written answers delivered subsequent to the meeting. Any new materials presented during the Annual General Meetings will be available on LHI's Investor Relations web portal.

Briefings and Press Conferences

Briefings and Press Conferences are normally held in conjunction with the announcement of the Group's fiscal half-year and full year financial results, and the announcement of major corporate developments. Such briefings and press conferences may take place at LHI's Head Office, via tele-conference calls and/or other mode(s) deemed suitable by the senior management.

Meetings and Interviews with Investors, Analysts and the Media

As part of the Group's Investor Relations programme, meetings and interviews are conducted on a regular basis with investors, analysts and the media. On all these occasions, care will be taken to ensure only information already in the public domain is discussed.

Leong Hup International Berhad (201401022577) (1098663-D)
Investor Relations Policy

10. MAJOR CORPORATE DEVELOPMENTS

The Group will strictly enforce its procedures for the protection of confidentiality until such time as the development of any major corporate development, such as a merger or acquisition or the launch of a significant new business or product, has received all requisite approvals. Thereafter, special attention will be paid to ensure the widest and most complete dissemination of information concerning the development, in line with the provisions of this Policy and the Listing Requirements.

11. ANALYSTS' REPORTS AND RUMOURS

Analysts' Reports

The Group's policy is to offer only verbal guidance when requested by analysts, and to point out factual errors or assumptions which are inconsistent with previously announced information. It will not influence the recommendation, opinions and conclusions of the analyst.

The Group will not endorse any analyst's report and will not circulate any analyst's report to any outside party. Nevertheless, through LHI's website, certain analyst reports are made available. The inclusion of these analyst reports does not necessarily imply a recommendation or endorse the views expressed within them and LHI makes no representations or warranties of any kind, express or implied, about the completeness, accuracy, reliability, suitability or availability with respect to the analyst reports. The Group may circulate such reports internally to its Board and senior management to assist them in understanding how the market and outsiders view LHI.

Rumours

The Group will not respond to rumours unless they appear to contain material information, or may be expected to affect the price of the LHI's securities or trading activity in those securities. When a report or rumour about the Group contains material, factual errors or omissions, LHI will issue an announcement to Bursa Malaysia to deny or clarify the report or rumour, and provide sufficient supporting information.

In general, the Group will take a proactive approach to the addressing of reports and rumours, so as to minimise uninformed speculation and promote an orderly market in its securities.

12. FORWARD-LOOKING INFORMATION & COMMENT

A forward-looking comment may be given in the Quarterly Report and included in a subsequent press release or briefing. The Group will not normally provide any forecast of its future financial results but may provide comments on its future prospects. Any forward-looking information or comment will be clearly qualified by a disclaimer or guidance not to rely on the data.

If the Group detects a significant variation between actual financial data and the forward-looking information previously provided, it will, after due consideration, issue a clarifying announcement to prevent misleading the market.

**Leong Hup International Berhad (201401022577) (1098663-D)
Investor Relations Policy**

13. ADOPTION OF POLICY

This Policy was adopted by LHI's Board of Directors on 26 November 2019. It is subject to annual review after which amendments may be made and approved by the Board.

14. CONTACT DETAILS

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Leong Hup International Berhad (201401022577) (1098663-D)
Investor Relations Policy

APPENDIX

A. TYPES OF AUDIENCE

The audience of the Group is diverse but will include the following:

- Shareholders and prospective investors
- Analysts, fund managers and investment bankers
- The financial press and other media
- Government and regulators
- Business partners and service providers.

B. TYPES OF MATERIAL INFORMATION

Material information is any information about the Group which might reasonably be expected to have a material effect on:

- the market price or value of the Group's securities, or activity in the trading of its securities; or
- a decision to buy, sell or continue holding the Group's securities which is made by an existing holder of those securities, or someone considering an investment in those securities.

The following gives a general description of matters which would be regarded as material information. This list is not exhaustive, and is for guidance purposes only.

- Any change in shareholders which might affect control of the Group;
- Any new issue of securities by the Group, or in the terms of its existing securities;
- Any information concerning dividends;
- Any material reorganisation or reconstruction of the Group;
- Material litigation and court decisions;
- Mergers, acquisitions and other major corporate developments;
- Any event of default in respect of a material financial obligation of the Group;
- The acquisition or loss of any material contract;
- Material new products;
- Material changes in the Group's business or its strategy or investment plans;
- Other events that may be expected to have a material effect on the Group's operations, financial condition or future prospects;
- Quarterly Reports of interim financial results, and the Group's annual audited accounts.