MYDCD BERHAD

Registration No.: 202501030429 (1631841-A)
(Incorporated in Malaysia)

CORPORATE DISCLOSURE POLICY

OBJECTIVE

The objective of this Policy is to ensure effective communication to shareholders and the general public regarding the business, operations and financial performance of MyDCD Berhad ("MyDCD" or "**the Company**") and its subsidiaries ("**the Group**"), and where necessary, information filed with regulators is in accordance with all applicable legal and regulatory requirements.

1. APPLICATION OF THE POLICY

This Corporate Disclosure Policy ("**this Policy**") applies to all Directors, Officers, Management and employees of the Group ("**MyDCD Personnel and Officers**"), and those authorised to speak on their behalf.

The disclosure requirements consist of the following:

a. Periodic disclosures;
b. Immediate disclosures;
c. Transaction based disclosures; and
d. Prescribed material events.

2. DISCLOSURE COMMITTEE

2.1 General

The Board of Directors of the Company ("**Board**") is ultimately responsible for ensuring that this Policy is implemented effectively, and that the disclosure requirements as set out are strictly complied with. The Board delegates the implementation of this Policy to the Disclosure Committee to be headed by the Chief Executive Officer ("**CEO**").

It is the responsibility of MyDCD Personnel and Officers to keep the Disclosure Committee and/or authorised spokespersons fully informed of all significant developments in the Group that could potentially impact the disclosure process to facilitate the determination of materiality, appropriateness, and timing for public disclosure of the information.

2.2 Composition of the Disclosure Committee

The Disclosure Committee is responsible for overseeing the Company's disclosure practices in complying with this Policy.

The Disclosure Committee comprises the following members:

a. CEO;
b. Chief Financial Officer or Financial Controller ("**Head of Finance**");

c. Outsourced Company Secretary Agent ("**Secretary Agent**"); and
d. Sponsor.

The Head of Finance will serve as the primary contact person for the Disclosure Committee and will engage other members as necessary and appropriate to the matter at hand. In his/her absence, other members can be contacted for matters referred to in this Policy.

Pursuant to Rule 4.10 of the ACE Market Listing Requirements ("**Listing Requirements**") of Bursa Malaysia Securities Berhad ("**Bursa Securities**"), the Sponsor of the Company must review any Public Document to be submitted or disclosed by the Company to Bursa Securities except –

- the annual audited financial statements issued by the Company;

- announcements made by the Company as referred to under Rule 9.17(2)(a) of Listing Requirements of Bursa Securities; or

- where the Company has appointed an entity other than the Sponsor to be an Adviser for the purpose of preparation or submission of the Public Document to Bursa Securities.

"**Public Document**" means any announcement made by the Company to Bursa Securities and document issued by the Company to the holders of any class of securities in the Company pursuant to the Listing Requirements of Bursa Securities.

3. DESIGNATED SPOKESPERSONS

The Company designates a limited number of spokespersons ("Authorised Spokespersons") responsible for the disclosure of corporate information and communication with Bursa Securities, investment analysts, potential investors or the media.

The following personnel are currently the Authorised Spokespersons and they may authorise other persons to communicate with the media or the investor community from time to time:

a. Chairperson of the Board
b. CEO and/or
c. Head of Finance

In addition, the representatives designated by the Secretary Agent are authorised to release and submit all relevant announcements, periodic financial reports/returns, disclosure forms as approved by the Director(s) and/or the Sponsor of the Company and/or any other secretarial related information to Bursa Securities and Securities Commission Malaysia for and on behalf of the Company, including to communicate, orally or in writing, with Bursa Securities and/or any other authorities as well as the shareholders and beneficial owners regarding secretarial, corporate governance, other shareholders or administrative matters.

MyDCD Personnel and Officers who have not been designated by the Authorised Spokespersons **MUST NOT** respond under any circumstances to inquiries from the investment community, the media, or others. All such inquiries should be referred to

the Authorised Spokespersons or to those persons designated by the Authorised Spokespersons, from time to time.

4. RESPONSIBILITIES AND PROCEDURES FOR DISCLOSURE OF MATERIAL INFORMATION

The Disclosure Committee will manage all the Company's release of announcements of material information to Bursa Securities through the Secretary Agent via their Bursa LINK.

The Secretary Agent and/or Head of Finance of the Company or the appointed Adviser will draft the announcement which will then be reviewed by the Disclosure Committee to ensure compliance with the Listing Requirements of Bursa Securities and the accuracy of the contents in the announcement.

All announcements must be approved by the CEO before their release to Bursa Securities. In the absence of the CEO, the Head of Finance shall approve the announcement.

After public dissemination, the announcement will be made available and accessible on the Company's corporate website. The Head of Finance is responsible for ensuring that the information contained in the "Investor Relations" section of the Company's corporate website is accurate and kept up-to-date.

5. CONFIDENTIALITY OF INFORMATION

Any employee privy to confidential corporate information is prohibited from communicating such information to anyone else unless it is necessary to do so in the course of business or required by law or authorised by the Disclosure Committee. Efforts will be made to limit access to such confidential information to only those who "need to know" the information.

Outside parties privy to undisclosed material information concerning the Company will be told that they must not divulge such information to anyone else.

6. MATERIAL INFORMATION

For the purpose of this Policy, material information should follow the guidelines and interpretation of applicable rules and regulations of Listing Requirements of Bursa Securities.

As a general guideline, information relating to the business and affairs of the Company is considered material if it is reasonably expected to have a material effect on:

a. the price, value, or market activity of any of the Company's securities; or

b. the decision of a holder of securities of the Company or an investor in determining his/her choice of action.

Without limiting the generality of the above, material information may include information which –

a. concerns the listed corporation'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 interests of the listed corporation's securities; or

d. relates to any event materially affecting the size of the public holding of its securities.

7. IMMEDIATE DISCLOSURE OF MATERIAL INFORMATION

Subject to the terms of this Policy, material information will be announced immediately to Bursa Securities first and made available on the Company's corporate website. The Company would endeavour to take a consistent approach to materiality.

8. CLARIFICATION, CONFIRMATION OR DENIAL OF RUMOURS OR REPORTS

Whenever the Company becomes aware of a rumour or report, true or false, that contains material information, it will consult with its Directors, major shareholders and such other persons familiar with the matter, to ascertain 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.

All announcements made must contain sufficient facts to support the clarification, confirmation or denial and also publicly clarify any rumors or reports 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.

9. UNUSUAL MARKET ACTIVITY

Where there is an unusual trading activity or price movement in the Company's securities, the Company must upon query from Bursa Securities undertake due enquiry with the relevant persons such as its Directors and major shareholders to determine the cause and issue a clarifying announcement.

10. WITHHOLDING OF MATERIAL INFORMATION

Material information may be kept confidential temporarily if the immediate release of the information would be unduly detrimental to the interests of the Group. In such cases, the information will be kept confidential at all times or to allow only certain persons to have access to such information to minimise leakage of information and ensure the security of the relevant confidential documents until the Disclosure Committee determines it is appropriate to publicly disclose or that the Company has a legal obligation to do so.

The Company will monitor its market activity and rumours or news reports concerning the information (if any). If confidentiality of information is lost or cannot be maintained or is believed to have been inadvertently disclosed to third parties or where the material information has become generally available through the media or otherwise, the Company shall immediately announce the information to Bursa Securities.

11. DEALINGS WITH ANALYSTS, INVESTORS AND THE MEDIA

Authorised Spokespersons are permitted to participate in briefing sessions with the financial analysts, institutional investors, media, and other market professionals on an individual or small group basis as needed. They will initiate contacts or respond to their calls in a timely, consistent, and accurate fashion in accordance with this Policy. The Company will provide only factual and non-speculative information during such meetings/briefings.

If during such meetings or responses to the calls, there is inadvertent selective disclosure of previously undisclosed material information, the Company will immediately disclose such information and/or consider whether a request for suspension is needed to enable the release of information.

12. INSIDER TRADING RESTRICTION

Under Section 188(1) of the Capital Market & Services Act 2007, 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 to have a material effect on the price or the value of the securities; and

b. Knows or reasonably ought to know that information is not generally available.

Based on the above definitions, these persons would include but are not limited to the following:

- Directors, officers and employees of the Group;
- Persons who provide business or professional services to the Group; and
- Any other person or company informed of undisclosed material information about the Group by any of the above parties.

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

13. UNWARRANTED PROMOTIONAL DISCLOSURE ACTIVITY

The Company must refrain from any form of promotional disclosure activity that may mislead investors or cause unwarranted price movement and activity in a listed corporation's securities. Such activity includes news releases, public announcements, predictions, reports, or advertisements that are:

a. not justified by actual developments concerning the Company;

b. exaggerated;
c. flamboyant;
d. overstated; or
e. over-zealous.

14. CLOSED PERIODS

Pursuant to Rule 14.02(b) of the Listing Requirements of Bursa Securities, "Closed Period" refers to 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.

The above requirement applies to dealings in the Company's securities by the following persons (collectively referred to as "Affected Person"):

a. A director of the Company or its major subsidiary; and

b. *A principal officer of the Company or its major subsidiary.

**__Principal officer__ means the chief executive who is not a director, Chief Financial Officer or any other employee of the Company or its major subsidiary respectively who has access or is privy to price-sensitive information in relation to the Company.*

As required under the Listing Requirements of Bursa Securities, the Affected Person must not deal in the Company's securities as long as he/she is in possession of price-sensitive information relating to the Company's securities during the Closed Period.

The Affected Person who wishes to deal in the Company's securities during a Closed Period must first give notice of his/her intention to deal in writing to the Company and further comply with Rule 14.08 of Listing Requirements of Bursa Securities.

In summary, the procedures for dealing during the Closed Period are as follows:

- before any proposed dealing, the Affected Person must give notice of intention to deal in writing to the Company during a Closed Period;
- upon receipt of such notice, the Company must immediately announce it to Bursa Securities;
- any proposed dealing can only be effected after **1 full market day** from the date of the announcement made above;
- the affected person must give notice of his/her dealing in writing to the Company Secretary of the Company within **1 full market day** after the dealing has occurred;
- the Company must immediately announce such notice to Bursa Securities.

15. REVIEW OF THIS POLICY

The Board will review this Policy from time to time and make any necessary amendments to ensure it remains consistent with the Board's objectives and responsibilities.

16. BOARD APPROVAL

This Policy (Version No. 1) was reviewed and approved by the Board on 8 October 2026.