


<b>POLICY</b>	<b>HEXTAR GLOBAL BERHAD</b> <b>199001014551 (206220-U)</b>				
	Document Title: <b>INSIDER TRADING POLICY</b>				
Document No.:	HGB-POL007-01	Revision:	1	Page No.: 1 of 11	Date: 21 Feb 2022

## 1.0 PURPOSE

- 1.1 The Capital Markets and Services Act 2007 (“CMSA”) and the Main Market Listing Requirements of Bursa Malaysia Securities Berhad (“Bursa Securities”) prohibit the purchase or sale of securities by any person who is in possession of price-sensitive information relating to the company, as well as the disclosure of such information to others who then trade in the company’s securities.
- 1.2 The Board of Directors of the Company has adopted this Insider Trading Policy, as part of the Company’s responsibility to prevent insider trading by the Company personnel and to help Company personnel avoid committing acts that contravene the provisions of insider trading law.
- 1.3 This Insider Trading Policy is also intended to prevent even the appearance of improper conduct in the trading of the Company’s securities, on the part of anyone employed by or associated with the Company, not just the insider.
- 1.4 Definitions

“**Company or Hextar**” means Hextar Global Berhad and/or any of its subsidiaries.


“**Company personnel**” means any employee of the Hextar and shall include contract staff, consultants, temporary employees and interns.

“**Closed period**” means a period commencing 30 calendar days before the targeted date of announcement up to the date of announcement of Hextar’s financial quarterly results to Bursa Securities.

“**Insider**” is a person if he:

- (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 securities; and
- (b) knows or ought reasonably to know that the information is not generally available. (Section 188 of CMSA)

“**Insider Trading**” refers to a situation, where a person, by virtue of his position, access unannounced price sensitive information (not generally available) of the company, gains such access and subsequently uses the information obtained for his or her personal benefits.

<b>POLICY</b>	<b>HEXTAR GLOBAL BERHAD</b> <b>199001014551 (206220-U)</b>		
	Document Title: <b>INSIDER TRADING POLICY</b>		
Document No.:	HGB-POL007-01	Revision: 1	Page No.: 2 of 11 Date: 21 Feb 2022


**“Insider Trading Policy”** means this Statement of Policy Regarding Securities Trades by Company Personnel.

**“Information”** is defined in the CMSA for purposes of the rules on insider trading include the following:

- a) matters of supposition and other matters that are insufficiently definite to warrant being made known to the public;
- b) matters relating to the intentions, or likely intentions of a person;
- c) matters relating to negotiations or proposals with respect to commercial dealings or dealing in securities;
- d) information relating to the financial performance of a corporation;
- e) information that a person proposes to enter into, or has previously entered into one or more transactions or agreements in relation to securities or has prepared or proposes to issue a statement relating to such securities; and
- f) matters relating to the future.

**“Material information”** means any information that a reasonable investor would consider important in making a decision to buy or sell his securities. Any information that might reasonably be expected to affect the company’s stock price, whether it is positive or negative, should be considered material. Some examples of information that would ordinarily be regarded as material are:

- a) Projections of future earnings or losses, or other earnings guidance.
- b) Proposed merger, acquisition or tender offer.
- c) Proposed acquisition or disposition of a significant asset.
- d) Change in dividend policy, declaration of a stock split, or an offering of additional securities.
- e) Change in management.
- f) Introduction or development of a new product or discovery.
- g) Impending bankruptcy, existence of severe liquidity problems or default in loan repayments.
- h) Occurrence of labour dispute with sub-contractors, customers or suppliers.
- i) Acquisition or loss of a contract, franchise or distributorship rights.
- j) Commencement of or involvement in litigation.
- k) Change in general business direction.

<b>POLICY</b>	<b>HEXTAR GLOBAL BERHAD</b> <b>199001014551 (206220-U)</b>						
	Document Title: <b>INSIDER TRADING POLICY</b>						
Document No.:	HGB-POL007-01	Revision:	1	Page No.:	3 of 11	Date:	21 Feb 2022

**“Price-sensitive information”** means information that on becoming generally available would or would tend to have a material effect on the price or value of securities, refers to such information which would or would tend to, on becoming generally available, influence reasonable persons who invest in securities in deciding whether or not to acquire or dispose of such securities, or enter into an agreement with a view to acquire or dispose of such securities. (Section 185 of the CMSA)

## 2.0 INSIDER TRADING MATTERS

### 2.1 Consequences of an Insider Trading Violation

The consequences of an insider trading violation can be severe:

***On Traders:*** Company personnel (or their tipplers) who trade on inside information are subject to the following penalties:


**a) Criminal Penalty under the CMSA**

- A fine of not less than RM1,000,000 (no matter how small the profit); and
- A jail term of up to 10 years.

**b) Civil Liability under the CMSA**

A person who suffers loss or damages by reason of, or by relying on the conduct of another person who committed the offence of insider trading may recover the amount of loss or damage by instituting civil proceedings against the other person.

The Securities Commission may, if it considers that it is in the public interest to do so, institute civil action against the insider or any other person involved in the contravention to recover an amount equal to 3 times the amount being the difference between the price at which the securities disposed of or agreed to be disposed of and the price which they would have been likely to have been disposed of at the time of the disposal or agreement if the information had been generally available and claim civil penalty being an amount not more than RM1,000,000.

<b>POLICY</b>	<b>HEXTAR GLOBAL BERHAD</b> <b>199001014551 (206220-U)</b>						
	Document Title: <b>INSIDER TRADING POLICY</b>						
Document No.:	HGB-POL007-01	Revision:	1	Page No.:	4 of 11	Date:	21 Feb 2022

***On Tipsters:*** An employee who communicates, or “tips” inside information to a person who then trades are subject to the same penalties as the tipper, even if the employee did not trade and did not profit from the tipper’s trading.

***Additional Sanctions by the Company:*** An employee’s failure to comply with the Company’s Insider Trading Policy may subject the employee to Company-imposed sanctions, including termination of employment for cause, whether or not the employee is charged with an offence in respect of the contravention of Section 188 of the CMSA or whether or not a contravention has been proven in a prosecution. Needless to say, an investigation, a charge in a court of law or an investigation by the Securities Commission, whether or not result in prosecution, can tarnish one’s reputation and irreparably damage his/her career and future prospects.


## 2.2 Persons subject to Insider Trading Policy

2.2.1 As long as you are a director, officer or employee of the Company, this Insider Trading Policy applies to:

- You.
- Your family members who reside with you.
- Any family members who do not live in your household but whose transactions in the securities of Hextar are directed by you or are subject to your influence or control (such as parents or children who consult with you before they trade in the securities of Hextar.)
- Friends, acquaintances or business associates whom you know or ought reasonably to know that such person, either by himself/herself or a third person, would or would tend to trade on the basis of the inside information.

2.2.2 As a director, officer or employee, you are responsible for the transactions of the abovementioned persons and therefore you should make them aware of the need to confer with you before they trade in the securities of Hextar. As used in this Insider Trading Policy, “you” means anyone subject to this Insider Trading Policy.

2.2.3 If you are in possession of inside information when you cease being a director, officer or employee, this Insider Trading Policy will continue to apply until that information has become public or is no longer material.

<b>POLICY</b>	<b>HEXTAR GLOBAL BERHAD</b> <b>199001014551 (206220-U)</b>			
	Document Title: <b>INSIDER TRADING POLICY</b>			
Document No.:	HGB-POL007-01	Revision:	1	Page No.: 5 of 11
				Date: 21 Feb 2022

## 2.3 Specific Restrictions

### A. No Trading or Acting on Inside Information

If you possess inside information relating to Hextar, you shall not, either directly or through family members or other persons or entities:

- Buy or sell securities of Hextar.
- Engage in any other action to take personal advantage of that inside information.
- Pass that inside information on to others outside the Company, including members of your family, friends, acquaintances and business associates.

If you learn of inside information about another company with which Hextar does business, including a customer or supplier, you shall not trade in the other company's securities until that information becomes public or is no longer material.


Transactions that may be necessary or justifiable for independent reasons (such as the need to raise money for an emergency expenditure) are not exempted from the Insider Trading Policy. The securities laws do not recognise such mitigating circumstances and in any event, even the appearance of an improper transaction must be avoided to preserve the Company's reputation for adhering to the highest standards of conduct.

### B. When Information Becomes Public

Information is not deemed to become "public" until the information has been disclosed broadly to the marketplace (such as by the Company's press release or an announcement made to Bursa Securities and the investing public has had time to absorb the information fully).

### C. 20/20 Hindsight:

Remember, anyone scrutinizing your transactions will be doing so after the fact, with the benefit of hindsight. As a practical matter, before engaging in any transaction, you should carefully consider how enforcement authorities and others might view the transaction in hindsight.

<b>POLICY</b>	<b>HEXTAR GLOBAL BERHAD</b> <b>199001014551 (206220-U)</b>		
	Document Title: <b>INSIDER TRADING POLICY</b>		
Document No.: HGB-POL007-01	Revision: 1	Page No.: 6 of 11	Date: 21 Feb 2022

#### 2.4 No Individual Disclosure of Information

The Company is required to avoid the selective disclosure of inside information. The Company has established procedures for releasing material information in a manner that is designed to achieve broad public dissemination of the information immediately upon its release. Therefore:

- You shall not disclose information about Hextar to anyone outside the Company, including family members, friends, acquaintances and business associates; and
- You shall not discuss about the Company, Hextar or its business in an internet “chat room” or similar internet-based forum, blogs, social networks such as Facebook and Twitter.


### 3.0 OTHER PROHIBITED TRANSACTIONS

The Company considers it improper and inappropriate for any director, officer or other employee of the Company to engage in speculative transactions in the securities of Hextar or other transactions which might give the appearance of impropriety. Therefore, this Insider Trading Policy also prohibits the following transaction:

***Margin Accounts and Pledges:*** Securities purchased on margin may be sold by the broker without the customer’s consent if the customer fails to meet a margin call. Similarly, securities held in an account which may be borrowed against or are otherwise pledged (or hypothecated) as collateral for a loan may be sold in foreclosure if the borrower defaults on the loan. A margin sale or foreclosure sale may occur at a time when the pledgor is aware of price-sensitive information or otherwise is not permitted to trade in the company’s securities.

Therefore, you may not purchase the securities of Hextar on margin, or borrow against any account in which the securities are held, or pledge the securities as collateral for a loan.

*[NOTE: An exception to the prohibition against pledges may be granted where a person wishes to pledge the securities as collateral for a loan (not including margin debt) and clearly demonstrates the financial capacity to repay the loan without resort to the pledged securities. Any person who wishes to pledge the securities as collateral for a loan must submit a request for approval to the Company Secretary at least 2 weeks prior to the execution of the documents evidencing the proposed pledge.]*

<b>POLICY</b>	<b>HEXTAR GLOBAL BERHAD</b> <b>199001014551 (206220-U)</b>		
	Document Title: <b>INSIDER TRADING POLICY</b>		
Document No.: HGB-POL007-01	Revision: 1	Page No.: 7 of 11	Date: 21 Feb 2022

#### 4.0 EXEMPTIONS FROM COMPLIANCE

This Insider Trading Policy does not apply to the following categories of dealings:

- Acceptance or exercise of options or rights under a share issuance scheme or share option scheme.
- Exercise of warrants.
- Conversion of convertible securities.
- Acceptance of entitlements under an issue or offer of securities, where such issue or offer is made available to all holders of the securities or to all holders of a relevant class of its securities, on the same terms.
- Undertaking to accept, or the acceptance of a take-over offer.
- Undertaking to accept, or the acceptance of securities as part of a merger by way of a scheme of arrangement.

Subsequent dealings in the securities of Hextar obtained as a result of the above dealings, are NOT exempted from compliance with this Insider Trading Policy.


#### 5.0 ASSISTANCE

If you have a question about this Insider Trading Policy or its application to any proposed transaction, you may obtain additional guidance from the Company Secretary at telephone no: (03) 2783 9191. Ultimately, however, the responsibility for adhering to this Insider Trading Policy and avoiding unlawful transactions rests with you.

#### 6.0 SUPPLEMENT TO THE INSIDER TRADING POLICY (“SUPPLEMENT POLICY”)

6.1 This Supplement Policy applies to dealings in the securities of the Company by a director of Hextar or its major subsidiary, and a principal officer of Hextar or its major subsidiary (collectively referred to as “**affected persons**”).

“**Principal officer**” means in relation to a Hextar or its major subsidiary, the chief executive who is not a director, chief financial officer, financial controller or any other employee of Hextar or its major subsidiary respectively who has access or is privy to price-sensitive information in relation to Hextar.

<b>POLICY</b>	<b>HEXTAR GLOBAL BERHAD</b> <b>199001014551 (206220-U)</b>		
	Document Title: <b>INSIDER TRADING POLICY</b>		
Document No.: HGB-POL007-01	Revision: 1	Page No.: 8 of 11	Date: 21 Feb 2022

6.2 **The affected persons MUST NOT deal in the securities of Hextar as long as they are in possession of price-sensitive information, as they shall be liable for insider trading.** However, those who are NOT in possession of price-sensitive information, may engage in dealings during a closed period provided that they comply with the procedures set out in this Supplement.

6.3 The policies and procedures described in this Supplement are a part of the Company's Insider Trading Policy and are in addition to the other requirements of the Insider Trading Policy.

## 7.0 PERSONS SUBJECT TO THIS SUPPLEMENT POLICY

7.1 This Supplement Policy which applies to an **affected person** of Hextar, is also subject to the requirements of Chapter 14 of the Main Market Listing Requirements of Bursa Securities.

In addition, the Company Secretary may from time to time designate any employee, either by name or title as the affected person, and this Supplement Policy will be effective immediately when the affected person receives the notice of his designation and a copy of this Supplement Policy.

7.2 An affected person is responsible for his dealings and therefore the affected person should be aware of these procedures before he deals in the securities of Hextar.

7.3 This Supplement Policy will cease to apply to an affected person upon the expiration of any "blackout period" (see below) or upon termination of his service or, being designated by the Company Secretary as no longer subject to this Supplement Policy.

## 8.0 PROCEDURE FOR DEALINGS IN SECURITIES DURING CLOSED PERIODS


8.1 Before any proposed dealing, an affected must give notice of intention to deal in writing to the Company Secretary.

8.2 Upon receipt of such notice, an immediate announcement must be made to Bursa Securities, stating the following information: -

- a) the affected person's current holdings of securities in Hextar; and
- b) the affected person's intention to deal in the securities of Hextar during a closed period.

8.3 The proposed dealing can only be effect or commence after 1 full market day from the date of announcement made pursuant to item (b) above. "**1 full market day**" excludes the day on which an announcement is made.



<b>POLICY</b>	<b>HEXTAR GLOBAL BERHAD</b> <b>199001014551 (206220-U)</b>						
	Document Title: <b>INSIDER TRADING POLICY</b>						
Document No.:	HGB-POL007-01	Revision:	1	Page No.:	9 of 11	Date:	21 Feb 2022

8.4 The affected person must give notice of the dealing in writing to the Company Secretary within 1 full market day after the dealing has occurred and the Company Secretary must immediately announce such notice to Bursa Securities. The notice and announcement shall contain the following information:

- a) the date on which the dealing occurred;
- b) the consideration for the dealing; and
- c) the number of securities involved in the dealing, both in absolute terms and as a percentage of all issued securities of that class in Hextar.

## **9.0 PROCEDURE FOR DEALINGS IN SECURITIES OUTSIDE CLOSED PERIODS**

9.1 If an affected person deals in the securities of Hextar outside closed periods, the affected person must within 3 market days after the dealing has occurred, give notice of the dealing in writing to the Company Secretary who will then make an immediate announcement to Bursa Securities of such dealing.


9.2 The notice and announcement shall contain the following information:

- a) the date on which the dealing occurred;
- b) the consideration for the dealing; and
- c) the number of securities involved in the dealing, both in absolute terms and as a percentage of all issued securities of that class in Hextar.

## **10.0 EVENT-SPECIFIC BLACKOUTS**

10.1 From time to time, a material event may occur to the Company and may be known by only a few employees of the Company. If you are the affected person who has access or privy to price-sensitive information in relation to the material event, then you shall not deal in the securities of Hextar so long as the event remains material, confidential and non-public.

10.2 The existence of such event-specific blackout may not be announced yet or may be temporarily withheld if the facts are still in the state of flux. If you are aware of the existence of an event-specific blackout, you also shall not disclose the existence of the blackout event to any other person.

<b>POLICY</b>	<b>HEXTAR GLOBAL BERHAD</b> <b>199001014551 (206220-U)</b>		
	Document Title: <b>INSIDER TRADING POLICY</b>		
Document No.: HGB-POL007-01	Revision: 1	Page No.: 10 of 11	Date: 21 Feb 2022

## 11.0 CERTIFICATION

An affected person which is subject to this Supplement Policy must certify their understanding of, and intent to comply with, not only this Supplement but also the other provisions of the Company's Insider Trading Policy. Please sign, date and return the attached Certification within 5 days after your receipt of this Supplement Policy.

This Policy was adopted by the Board on 21 February 2022 and is made available on the Company's website, <https://www.hextarglobal.com/ir.php>.

**CERTIFICATION**

I hereby certify that:

- 1) I have read and understand the Company's Insider Trading Policy and the Supplement Policy\*;
- 2) I understand that the Company Secretary is available to answer any question I may have regarding the Insider Trading Policy and the Supplement Policy\*;
- 3) Since I have been a director or employee of the Company or designated as the affected person of this Supplement Policy\*, I have complied with the Insider Trading Policy and the Supplement Policy\*; and
- 4) I will continue to comply with the Insider Trading Policy and Supplement Policy\* for as long as I am subject to the above policies.

*\*delete if not applicable*

Signature : \_\_\_\_\_

Name : \_\_\_\_\_

Date : \_\_\_\_\_