Kinergy Advancement Berhad
Kinergy Group
Kinergy/ the Group

Insider Trading Policy

INSIDER TRADING POLICY

Policy Statement

This Policy provides the standards of **Kinergy Advancement Berhad and its Group of companies ("Kinergy" or "the Group")** on trading and causing the trading of the Group's shares or shares of other publicly traded companies while in possession of confidential information.

This Insider Trading Policy ("Policy") establishes the minimum standards for all Directors, Executive Officers, Head of Departments, employees and consultants ("Covered Persons") of the Group on the use and handling of material non-public information when trading the Group's shares.

All Covered Persons are strictly prohibited from trading, or causing others to trade, the Group's securities based on material non-public information obtained through their work.

1. Application

This Policy applies to all transactions in the Group's shares, including (but not limited to) ordinary shares, options, warrants and any other shares that the Group may issue, such as preferred shares, notes, bonds and convertible shares, as well as to derivative shares relating to any of the Group's shares, whether or not issued by the Group.

This Policy applies to all individuals serving the Group, including employees, officers, members of the Board of Directors, and all consultants appointed by the Group.

2. General Policy: No Trading or Causing Trading While in Possession of Material Non-public Information

a. Prohibition on Trading the Group's Securities
No director, officer, employee or consultant may purchase or sell any Group shares while in possession of material non-public information about the Group.

b. Prohibition on Tipping (sharing of information)
No director, officer, employee or consultant who is aware of any material non-public information about the Group may communicate, disclose, or "tip" such information to any other person, including such person's spouse, children, family, other persons living in such person's household, friends and entities over which the individual has control.

c. Prohibition on Trading Other Companies' Securities
No director, officer, employee or consultant may purchase or sell any shares of any other company while in possession of material non-public information about the Group obtained in the course of his or her involvement with the Group.

3. Definitions

a. Materiality

Information is considered "material" if a reasonable investor would consider it important when making an investment decision, or if it is likely to affect the Group's share price. Examples include, but are not limited to financial results, major contracts or projects, changes in senior management, significant corporate transactions, or major litigation. When in doubt, all information should be treated as material.

b. Non-public Information

Information is considered "non-public" until it has been formally disclosed to the market and at least two (2) full trading days have passed to allow investors to react to the information. Information that is shared only internally, or disclosed to limited external parties, remains non-public.

4. Violation of Insider Trading Laws

Penalties for trading on or communicating material non-public information can be severe, both for individuals and the Group. Violations my result in criminal prosecution, civil enforcement actions, substantial monetary fines, and imprisonment. Given the severity of the potential penalties, strict compliance with this Policy is mandatory for all Covered Persons.

a. Legal Penalties

Any individual who violates insider trading laws by engaging in transactions in a company's shares when he or she has material non-public information can be sentenced to a substantial jail term, criminal fines and/or payment of a penalty of several times the amount of profits gained or losses avoided.

b. Company-imposed Penalties

Employees who violate this Policy may be subject to disciplinary action by the Group, including termination of employment for cause.

5. Reporting and Compliance Channel

If anyone outside the organisation wishes to report concerns or information relating to potential insider trading violations, they may contact the Group's Whistleblowing Committee at:

a. Email: whistleblowing@kinergyadvancement.com

b. Mail Address: (Mark "**Strictly Confidential to be opened by the addressee only**")

KINERGY ADVANCEMENT BERHAD (Whistleblowing Committee)
28-01, Level 28,
Menara Vista Petaling,
137 Jalan Puchong,
58200 Kuala Lumpur

All reports will be handled confidentially.

6. Review

This Policy is subject to periodic review and refinement to ensure ongoing relevance, effectiveness and alignment with emerging regulatory requirements, industry best practices and stakeholder expectations. This Policy was approved by the Management of Kinergy on 24th November 2025.