	<b>CORPORATE DISCLOSURE POLICY AND PROCEDURE</b>	Doc. No. : CG-04
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## 1. INTRODUCTION

The Corporate Disclosure Policy and Procedure (“CDPP”) of Zen Tech International Berhad sets out the requirements for disclosure including the quality of disclosure to provide shareholders and investors with comprehensive, accurate and quality information on a timely basis. This CDPP provides a good framework for compliance with the disclosure policies under the ACE Market Listing Requirements and Bursa Malaysia Securities Berhad (“AMLR”).

## 2. OBJECTIVES

The objectives of this CDPP are to ensure that the Board, employees, and officers of the Group to whom this CDPP applies understand their obligations to preserve the confidentiality of material information.

## 3. DESIGNATED PERSONS

The designated persons of the Group responsible for ensuring compliance, overseeing, and coordinating the disclosure of material information are as follows: -


No	Name	Position	Email	Contact No
i)	Siva Kumar	Executive Director	<a href="mailto:siva@ztech.com.my">siva@ztech.com.my</a>	+603-9281 5797
ii)	Dato’Zhang Li	Executive Director	<a href="mailto:helen1339@gmail.com">helen1339@gmail.com</a>	+603-9281 5797
iii)	Chow Hung key	Executive Director	<a href="mailto:chkeey@ztech.com.my">chkeey@ztech.com.my</a>	+603-9281 5797

The Executive Director will serve as the primary contact person for the disclosure requirement and will engage other persons as stipulated above as necessary and appropriate to the matter at hand. In his or her absence, other persons can be contacted for matters referred to in this CDPP.

## 4. PRINCIPLES OF DISCLOSURE CONTROLS AND PROCEDURES

### 4.1 Immediate Disclosure of Material Information

Any material information that is reasonably expected to have a material effect on the price, value or market activity of the shares or the investors’ decision making, must be announced immediately to Bursa Malaysia, and made available in the Company’s website.

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#### **4.2 Withholding of Material Information and Maintaining Confidentiality**

Material information may be kept confidential temporarily if the immediate disclosure would prejudice the ability of the Company to pursue its corporate objectives. In such cases, the Company must ensure that the material information will be kept confidential to prevent from leakage. The Company should limit the number of people with access to or in possession of the material information and ensure that all confidential documents are being protected and secured.

#### **4.3 Clarification, Confirmation or Denial of Rumours or Reports**

Whenever the Company becomes aware of any rumour or report, the Company should enquire whether it is true or false or contains any material information and make immediate disclosure to clarify, confirm or deny the rumour or report. The disclosure can be in any form including that by word-of-mouth and not limited to an article or otherwise publish the disclosure in the media.

#### **4.4 Unusual Market Activity**

Where there is unusual price movement and or unusual trading activity in the shares of the Company, the Company must immediately undertake a due enquiry to seek the cause of the unusual market activity and make the announcement to the Bursa.

#### **4.5 Promotional Disclosure Activity**


The Company must not engage in any promotional disclosure activity in any form which may mislead the investors or caused unusual price movement in the shares of the Company.

#### **4.6 Equal Access to Material Information**

The Company must disclose to the public all material information necessary for informed investing and take reasonable steps to ensure that all investors who invested in the shares of the Company enjoy equal access to this information. The Company must ensure that no disclosure of material information is to be made on an individual or selective basis unless such information has previously been fully disclosed or disseminated to the public.

#### **4.7 Corporate Website**

The Company must have its corporate website where the website must publish all announcement made pursuant to the AMLR as soon as the announcements are released to the Bursa's website. The Company must ensure that its website is regularly updated with current information and contained information to enhance investor relations which include the email address, name of designated persons and their contact numbers to enable the queries from the public be forwarded to the Company.

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#### **4.8 Periodic Disclosures**

##### **4.8.1 Quarterly Report**

An interim financial report that is prepared on a quarterly basis (“quarterly report”) must be announced to the Bursa as soon as the figures are approved by the Board and in any event not later than two months after the end of each quarter of a financial year. The quarterly report must include the information as stipulated in the AMLR.

##### **4.8.2 Issue of Annual Audited Financial Statements and Annual Report**

The Company must issue its annual report that include the annual audited financial statements on a consolidated basis together with the auditors’ and directors’ reports of the Company and forward them to Bursa and shareholders not later than four (4) months from the close of the financial year end of the Company. The annual audited financial statements together with the auditors’ and directors’ reports must be announced to Bursa not later than four (4) months from the close of the financial year end of the Company.

#### **5.0 REVIEW OF THE CDPP**

This CDPP shall be reviewed by the Board at least once a year to ensure it remains consistent with the Company’s objectives and Board’s responsibilities and in line with the relevant laws and legislations.