

PEGASUS HEIGHTS BERHAD
[Registration No. 197401002677 (19727-P)]

Corporate Disclosure Policy

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1. Introduction

- 1.1. The Board of Directors (“**the Board**”) of Pegasus Heights Berhad (“**the Company**”) has adopted the Corporate Disclosure Policy (“**the Policy**”) for Directors of the Company and its subsidiaries (collectively referred to as “**the Group**”). This Policy has taken into account the recommendation contained in the Malaysian Code on Corporate Governance and disclosure obligations contained in the listing requirements of Bursa Malaysia Securities Berhad, thus instilling the tenets of good governance within the practices of the Company.
- 1.2. This document outlines the Company’s policy on the determination and dissemination of sensitive and material information to investors, stakeholders, the investing public and other relevant persons in line with the applicable legal and regulatory requirements. This Policy is applicable to all Directors, management staff, officers and employees of the Group.

2. Administrative and Responsibilities

- 2.1 The Executive Director (“**ED**”) and Group Accountant will be primarily responsible for ensuring that the Company complies with all legal and regulatory disclosure requirements, including:
 - (a) overseeing the Company’s corporate disclosure practices and monitoring compliance with this Policy;
 - (b) initiating, with input and advice from the other members of senior management, disclosure of material information in accordance with the processes and procedures set out in this Policy;
 - (c) ensures the information is disclosed in a timely manner as prescribed by regulations;
 - (d) maintain accurate records pertaining to all disclosures made; and
 - (e) dealing with any issues which may be raised from time to time by the regulatory authorities.
- 2.2 The ED and Group Accountant have been appointed as spokespersons to communicate with audience constituents and respond to questions in relation to the corporate vision, strategies, developments, future prospects, financial results and plans, operation matters, etc.

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3. Mode of Disclosure

3.1. The Group makes use of a broad range of communication channels to disseminate information regarding the Group. These would include:

- (a) Electronic facilities provided by Bursa Malaysia Securities Berhad;
- (b) Press releases;
- (c) Corporate website;
- (d) Emails; and
- (e) Annual General Meetings / Extraordinary General Meetings

4. Investor Relation Programmes and Strategies

4.1. The Group would undertake the following programmes and strategies, if necessary, to bridge and enhance the relationship with investors or potential investors:

(a) **Announcement of Material Information and Press Release**

After the approval from the Board of Directors on releasing material information is obtained, an announcement is made to the Bursa Exchange or a company press release will be issued to all major newspapers.

(b) **Annual General Meeting or Extraordinary General Meeting or Press Conference**

The Annual General Meeting / Extraordinary General Meeting / Press Conference is held to communicate with the shareholders on the Group's performance, strategy, proposed corporate exercises, outlook, operational matters, etc.

(c) **Annual and Quarterly Financial Reports**

The Annual Report and Quarterly financial reports are submitted to the Bursa Exchange and also available on the corporate website of the Group.

(d) **Meetings or Interviews with Investors, Analysts and Media**

The spokespersons will meet the shareholders, analysts or media to update them on the Group's performance, strategy, development, etc.

(e) **Participate in Investor Relations Web Portal**

The Group has established a company website including the creation of an IR web portal to reach out to current and potential investors.

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5. Reports and Rumours

5.1. Analysts' Reports

- 5.1.1. It is the Group's policy not to provide focused guidance to analysts in their efforts to develop their financial reports or earnings estimate of the Company. The Company will point out factual errors or assumptions which are inconsistent with previously announced information.

5.2. Rumours

- 5.2.1. It is the Group's policy not to respond or comment on market rumours and speculation, unless they appear to contain material information or misinformation, or may be reasonably expected to affect the price of the Group's securities or trading activity in those securities.

6. Unusual Market Activity

Where there is unusual trading activity or price movement, the Group will undertake due enquiry with the relevant persons such as the directors, major shareholders to determine the cause and issue a clarifying announcement, if deemed necessary.

7. Monitoring, Periodic Review and Disclosure

- 7.1. This Policy should be reviewed annually and may be amended by the Board as it deems appropriate.