

DOLPHIN INTERNATIONAL BERHAD

[Registration no. 201201016010 (1001521-X)]

(Incorporated in Malaysia)

CORPORATE DISCLOSURE & COMMUNICATION POLICIES AND PROCEDURES

OBJECTIVES

Dolphin International Berhad (“Dolphin”) and its group of subsidiaries (“Group”) are committed to provide accurate, timely, factual, complete disclosure of material information to its internal and external stakeholders. All internal and external disclosure and communication should be aimed towards the achievement of the Group’s vision and mission and should be in line with the Group’s core strategy and values (including anti-corruption).

The purpose of this policy is to raise awareness and provide guidance on the extent, quality and output of disclosure and communication with the Group’s internal and external stakeholders in accordance with all applicable legal and regulatory requirements and to minimize the risk of negative impact to the Group’s reputation that can be caused through improper and unauthorized disclosure and communication.

This policy applies to the conduct of directors, management, officers, managers and employees of the Group and in respect of all methods that the Group uses to communicate with the public, including but not limited to:

- a) Written statement, Annual Reports, news releases, letters to shareholders, presentation by senior management, investor presentation, e-mail messages and the Group’s Internet web page;
- b) Oral statements, individual or group meetings, telephone conversation, interviews and news conference.

CORPORATE DISCLOSURE AND COMMUNICATION COMMITTEE

Corporate Disclosure and Communication Committee (“the Committee”) is responsible for overseeing the Group’s corporate disclosure and communication practices and ensure implementation and adherence to this policy. The Committee will be responsible for determining whether information is material information, appropriateness and timely disclosure of material information in accordance with securities laws and Listing Requirements of Bursa Malaysia Securities Berhad (“Bursa Securities”) and monitoring compliance with this policy and overseeing the disclosure controls and procedures.

Members of the Disclosure and Communication Committee are:

- i) Managing Director/Chief Operating Officer (“CEO”)
- ii) Independent Director
- iii) Company Secretary
- iv) Chief Finance Officer

Members can be added to or removed from the list upon consensus of existing members of the Corporate Disclosure and Communication Committee.

Legal advice will be sought should such need arises for an independent opinion.

The Executive Directors shall be responsible for ensuring compliance with all legal and regulatory disclosure requirements, including:

- i) Overseeing corporate disclosure practices and monitoring compliance with the policy.
- ii) Initiating with input and advice from other member of senior management, Company Secretary, external or internal auditors, disclosure of material information in accordance with the processes and procedures set out in this policy.
- iii) Dealing with any issues which may be raised from time to time by the regulatory authorities.

The Managing Director/CEO and any person delegated by him from time to time, are the individuals (“Spokespersons”) responsible for communicating the Group’s information to the investing public. The Spokespersons shall seek to ensure that no undisclosed material information is made available to any select group.

CORPORATE DISCLOSURE POLICY

Policies and Procedures on Corporate Disclosure

The Group must adhere to the following six specific policies concerning disclosure:

- i) Make immediately public disclosure of any material information
- ii) Release of material information to obtain its fullest possible public dissemination
- iii) Make due enquiry and immediately publicly provide for clarification, confirmation or denial of rumors or reports
- iv) Immediately seek the cause and response to unusual market activity
- v) Refrain from any unwarranted promotional disclosure activity
- vi) Prohibition from insider trading

The Group’s disclosure obligations consist of the following:

- i) Adherence to the Corporate Disclosure Policy of the Exchange
- ii) Preparation of announcements
 - Ensure content is factual, clear, unambiguous, accurate, succinct, sufficient, not false, misleading or deceptive and is balanced and fair
- iii) Immediate disclosure requirements
- iv) Periodic disclosure requirements:
 - Quarterly report
 - Annual audited financial statements and annual report
 - Status memorandum of understanding entered with third party
- v) Circulars and other requirements

Management must inform the Committee of any potentially material developments so that the committee can discuss and evaluate any events that might give rise to a disclosure obligation.

The Chief Financial Officer and the relevant departments shall review and verify the accuracy of all financial data and all information contained in the announcement to ensure that disclosures are consistent with the prevailing accounting standard and guidelines. All

announcements should be approved by Managing Director/CEO or any person delegated by the Managing Director/CEO prior to its release to Bursa Securities.

COMMUNICATION POLICY

Guiding Principles on Communication

The Group recognises that active communication with different stakeholders and the general public is an integral part of its communication strategy. In order to reach its overall goals for communication, the following guiding principles should always be adhered to:

- i) Only Managing Director/CEO and any person delegated by Managing Director/CEO from time to time (“Spokespersons”), shall be permitted to have formal engagements with external stakeholders via media engagements and press releases. He/ She also shall be responsible for any dissemination of information relating to matters regarding the Group’s business direction, financials, anti-corruption and other key matters as may be allowed by the relevant laws and regulations;
- ii) All information must be conveyed through the appropriate and approved disclosure and communication channels to Dolphin Group’s stakeholders on a timely manner. All requests for information by stakeholders shall be responded to by Managing Director/CEO after obtaining the necessary approval from the Committee. A turnaround time of five (5) working days shall apply to all requests; however, where the information sought may require more time to process, an acknowledgement of the request placed must be made within the stipulated time period. Any material information shall immediately disclosure to the public;
- iii) All information disseminated out should be approved by Executive Directors to ensure the content is factual, clear, unambiguous, accurate, sufficient, fair and not misleading. Executive Directors also responsible to ensure the Group has adhered to the disclosure requirements accordance with laws and Listing Requirements of Bursa Securities;
- iv) All Head of Departments shall proactively develop contacts with its target stakeholder groups and ensure timely, open and constant communication;
- v) All communication must be clear, concise and intentional; and
- vi) Regular feedback is encouraged from all stakeholders and will be applied towards ensuring better service in delivery. All Group’s disclosure and communication must be consistent in style and message to build stakeholder trust.

Guidelines for External Communication

The support and participation of Group’s external stakeholders are crucial to its long-term success and is therefore always desired. All communication to external stakeholders should be anchored on this premise and aimed at making the stakeholders feel involved and not alienated. External communication should also promote overall knowledge and awareness of the Group, its values, markets, products, services, etc., among the different external stakeholder categories.

All external communication must be approved by Executive Directors. All presentations/materials for external use must be reviewed by the Executive Directors prior to its dissemination to stakeholders to ensure brand compliance and accuracy of information related to the Group. This includes presentations to external stakeholders at meetings, seminars, conferences, etc. and materials to be uploaded to the website.

It is the Group's policy to manage its relations with the media in an open and pragmatic way. The Group will be responsive to the legitimate interests of the media. It will also be proactive in disseminating information about the Group, its policies and products when it is judged to be in the best interests of the business by corporate, functional or local management. Communication with media is to be handled with the highest levels of sensitivity and professionalism. Only authorised Spokepersons shall be permitted to grant interviews of any sort (print, TV, online) and be quoted with respect to the Group's external communications.

Guidelines for Internal Communication

The Group's internal communication is targeted at all its internal stakeholders, towards the achievement of its overall objectives. Furthermore, internal communication is aimed at strengthening the organisational culture and feeling of commitment among the internal stakeholders, thereby increasing active participation and team spirit.

Communication between and amongst employees must be professional at all times. Employees are to be addressed by either their first names or by their initials in all written communication, except letters which must bear the full name of the employees. The use of titles, nicknames or any other names is strictly prohibited in written communication.

PUBLIC STATEMENTS AND PERSONAL OPINION

All employees should refrain from making public statements of personal opinion regarding the Group and its markets. Such public statements may include quotes given to media, contribution to blogs, published articles, etc. Any such public statements must be approved by the Executive Director before publication.

PUBLIC OR INTERNET POSTING

Employees are forbidden from making any public posting of confidential or proprietary information related to any aspect of the Group's business on the Internet. Employees should not reveal information about the Group and its activities in any internet-based forum including (but not restricted to) chat rooms, bulletin boards, blogs, wikis, etc. Business-related internet-based tools may be operated by the Group but their use and content must be approved in accordance with the normal code of practice applicable in that market.

CONFIDENTIALITY OF INFORMATION

All directors and employees of the Group should not disclose undisclosed material information and shall not disclose confidential information to anyone outside of the organization prior to the broad public dissemination of that information. Selective disclosure to anyone outside of organization is illegal and is prohibited.

The following should be observed by the directors and employees:

- a) Do not discuss the business and affairs in any places may lead to overheard
- b) Confidential documents should not be read or displayed in public places or discarded where they can be retrieved
- c) Documents and files containing confidential information should be kept in a safe place to which access is restricted to individuals who “need-to-know” that information in the necessary course of business
- d) Transmission of documents by fax, email or other electronic means should be made only where it is reasonable to assume that transmission can be made and received under secure conditions
- e) If at any time, confidential material information is inadvertently leaked resulting in selective disclosures, the committee shall initiate a process to ensure that full and accurate public disclosure is made.