

ORION IXL BERHAD
(Company No. 554979-T)
(Incorporated in Malaysia)

BOARD CORPORATE DISCLOSURE POLICY

1. Introduction

Orion is committed to upholding high standards of transparency and promotion of investor confidence through the provision of comprehensive, accurate and quality information on a timely and even basis.

In adopting this policy, Orion has taken into account the recommendations contained in the Malaysian Code of Corporate Governance (“MCCG”), the disclosure obligations contained in the ACE Market Listing Requirements of Bursa Malaysia Securities Berhad (“Bursa Securities”) and the Corporate Disclosure Guide issued by Bursa Securities in September 2011.

2. Rationale and Objectives

The primary objectives of Orion’s Corporate Disclosure Policy are:

- To promote and elevate a high standard of integrity and transparency through timely comprehensive, accurate, quality and full disclosure.
- To promote and maintain market integrity and investor confidence.
- To exercise due diligence to ensure the veracity of the information being disseminated is factual, accurate, clear, timely and comprehensive.
- To build good relationship with all stakeholders based on transparency, openness, trust and confidence.
- To have in place efficient procedures for management of information, which promotes accountability for the disclosure of material information.

3. Disclosure Structure and Responsibility

To achieve its objectives, Orion has adopted the following structure and responsibility.

3.1 Corporate Disclosure Policies and Procedures (CDPP)

Orion has adopted the following Disclosure Policies and Procedures.

- Communicating and responding to all stakeholders in respect of all information relating to the Group through all forms of communication channels as outlined under 3.4 below.

3.2 Designated Spokesperson:

- i) The Managing Director
- ii) Chairman of the Board of Directors (“Board”)
- iii) or in their absence, the Group Executive Director

3.3 The Designated Spokesperson is responsible for:

- Proper dissemination of information and ensuring compliance with the disclosure obligations under the Listing Requirements.

- Communication, overseeing and co-ordinating disclosure of material information to all stakeholders in accordance with the Listing Requirements and ensuring appropriate security measures are in place to maintain integrity of the information being disseminated.

3.4 Disclosure and Dissemination Channels

Orion is authorised to make use of a broad range of communication channels to disseminate information to its stakeholders and these include:

- Electronic facilities provided by Bursa Securities
- Press releases
- Corporate website
- E-mail
- Road shows, exhibitions, analyst briefings, interviews or events, and
- General Meetings

4. Document Management

Orion has in place a structured and streamlined document management system in place for each of its operating departments.

These documents are securely stored and where material and sensitive, are restricted in its circulation to authorised personnel and locked away.

Orion also has in place, a highly secured Information Technology system for communication and document management purposes supported and maintained by an in-house IT Manager/Department.

Access to information in the IT system is secured and controlled through password protection and authorised access restrictions.

Financial information and other material price sensitive information access is further restricted to only designated senior management employees in the finance/accounts department. The finance/accounts department's information is not shared or accessible by other departments within the Group.

5. Restrictions, Prohibitions and Confidentiality

Only the following persons who "need to know" are authorised to have access and become privy to sensitive and material information that has not been disclosed and made available to the public.

- members of the Board.
 - the Financial Controller (CFO designate) and senior executives in the finance/accounts department designated by the Group Managing Director/Group Financial Controller.
 - the Company Secretaries, auditors, reporting accountants, lawyers, consultants and investment advisers on a "need to know basis" to enable such persons to carry out their roles and responsibilities at the appropriate time as may be determined by the Managing Director.
- the authorised persons upon coming into possession of such confidential information are reminded :

- Of the need to keep the information strictly confidential
- Of the restriction for insiders who are in possession of unreleased material information not to trade in the Company's securities or the securities of such related third parties, where applicable.
- Tip any third party with such information.

6. Where Confidentiality is Compromised

In the event, the confidentiality of the information has been compromised, Orion will take the appropriate steps to make an immediate announcement of the information (or clarify the status) to Bursa Securities.

Confidentiality is deemed to have been compromised where such information appears in analyst reports, media reports or market rumours accompanied by unusual market activity.

Where Orion becomes aware of a rumour or report, the Chief Executive Officer will consult with its Directors, major shareholders and such other relevant persons involved in the matter to determine:

- whether the rumour or report contains undisclosed material information, and
- whether immediate disclosure is required to clarify, confirm or deny the rumour or report.

As a general rule it is not Orion's policy to respond or comment on market rumours and speculations, unless they appear to contain elements of undisclosed material information.

7. This Policy was adopted on 23rd October 2018.