



A member of **UEM Group**

UEM SUNRISE BERHAD

200801028815 (830144-W)

INVESTOR RELATIONS AND SHAREHOLDER COMMUNICATION POLICY

As at 5 December 2017

UEM SUNRISE BERHAD

INVESTOR RELATIONS AND SHAREHOLDER COMMUNICATION POLICY

1. INTRODUCTION

- 1.1. As a public listed company, UEM Sunrise Berhad (“UEM Sunrise” or the “Company”) is committed to engage, communicate, and build a professional relationship with its shareholders, the financial and/or investment community, and other relevant stakeholders (collectively referred to as the “Stakeholders”) through a structured Investor Relations programme in line with the recommendations of the Malaysian Code on Corporate Governance and other relevant regulatory bodies.
- 1.2. In addition, UEM Sunrise is also obligated under the Listing Requirements of Bursa Malaysia Securities Berhad (“Bursa Malaysia”) to keep the market informed of all information which may have or could be expected to have a material effect on the price or value of its securities.
- 1.3. UEM Sunrise is committed to provide the Stakeholders with high quality, accurate and prompt information in enabling them to make careful and informed decision with regards to its securities.
- 1.4. The Investor Relations and Shareholder Communication Policy (“Policy”) is designed for strict compliance with these requirements as UEM Sunrise believes in maintaining full and open communication with the Stakeholders, observing the highest standards in corporate governance and communications with the intention to give the Stakeholders fair access to information.

2. OBJECTIVES

- 2.1. To create a climate of clear and open communication with the Stakeholders.
- 2.2. To provide a disciplined and professional approach to the flow of information from UEM Sunrise at all times.
- 2.3. To provide appropriate channels for effective two-way communication at all levels and assess their effectiveness on a regular basis.
- 2.4. To nurture loyalty and confidence of Stakeholders through frequent, full and forthright communication.
- 2.5. To minimise the risks of violating relevant compliance, laws and regulations when communicating information to the Stakeholders.

3. SCOPE

- 3.1. This Policy covers the Board of Directors of UEM Sunrise ("Board"), UEM Sunrise and/or its group of companies, Senior Management of UEM Sunrise, Investor Relations Unit, Corporate Communication Department, Brand Development Department, Authorised Spokespersons and all other relevant employees of UEM Sunrise and/or its group of companies.
- 3.2. The audience of the Stakeholders are wide. UEM Sunrise recognises this to include:
- a. Shareholders and prospective investors;
 - b. Analyst, fund managers and investment bankers;
 - c. Financial press and other media;
 - d. Government and regulators;
 - e. Business partners and service providers; and/or
 - f. Other organisations and special interest groups.

4. COMMUNICATION AND ENGAGEMENT WITH STAKEHOLDERS

- 4.1. UEM Sunrise is committed to ensure continuous engagement through the following platform:

<u>Engagement Platform</u>	<u>Minimum Frequency</u>
UEM Sunrise's Annual Report	Annually
Annual General Meeting	Annually
Financial Results Announcement	Quarterly
Corporate Briefings	As necessary
Analysts and Institutional Investor Engagement	As necessary
Investor Conferences / Corporate Roadshows	As necessary
Extraordinary General Meeting	As necessary
Press / Media Conferences	As necessary

- 4.2. In addition to item 4.1 above, information to the Stakeholders is also communicated via the following:
- a. All reports, corporate announcements and other documents filed with Bursa Malaysia, the Securities Commission, Malaysia and/or other regulatory bodies or listing exchange;
 - b. Statements, data, materials contained in UEM Sunrise's Annual Reports and any letters or circulars to shareholders;
 - c. Press releases or any presentations given by UEM Sunrise;
 - d. UEM Sunrise's corporate and general website at www.uemsunrise.com and Investor Relations website at <http://www.uemsunrise.com/investor-relations/>;
 - e. Articles, advertorial publications, and corporate brochures with regards to UEM Sunrise and/or its projects or developments;

- f. All correspondences, including emails, letters and text messages via mobile phones;
 - g. Verbal statements made in meetings, briefings, press / media conferences, interviews with the media, or during telephone conversations; and
 - h. Speeches given on behalf of UEM Sunrise.
- 4.3. All announcements be it to Bursa Malaysia and/or media must be duly authorised by the Board and/or Managing Director / Chief Executive Officer, prior to release in accordance with UEM Sunrise's internal documented Discretionary Authority Limits.
- 4.4. For a period of two weeks before the planned release of quarterly financial reports ("Close Period"), UEM Sunrise shall not comment on matters related to the its general financial results or expectation.

5. COMMUNICATION QUALITIES CRITERIA

- 5.1. UEM Sunrise endeavours to ensure that the following criteria are applied. Errors and/or omissions will be corrected as soon as they are known.
- a. Consistency – The same information will be given to the Stakeholders at the same time;
 - b. Clarity – Information will be sufficient, accurate upon release, easily understood and will avoid jargon and/or legal and technical phrases, where possible;
 - c. Equal Access – Information will be disseminated to the widest possible audience through the use of all appropriate communication channels;
 - d. Timeliness – Information will be released as soon as it is known unless there are legal constraints or legitimate business reasons not to do so; and
 - e. Transparency – Information will be presented in a balanced and fair manner, irrespective of whether or not it is favourable to UEM Sunrise.

6. SPOKESPERSON(S) AND COMMUNICATION AUTHORITY

- 6.1. Employees (other than the Authorised Spokespersons) are not permitted to respond to inquiries from the Stakeholders. Employees are instructed to channel all such inquiries to the Investor Relations unit and/or Corporate Communication department, where applicable.
- 6.2. Only Authorised Spokespersons may communicate on behalf of UEM Sunrise to the Stakeholders, except as otherwise provided by this Policy.
- 6.3. The Authorised Spokespersons are divided into three categories as follows:

- a. Primary Spokespersons consists of the Managing Director/Chief Executive Officer of UEM Sunrise and Chief Financial Officer of UEM Sunrise. This category of spokespersons may communicate directly to the Stakeholders, provide information, data and analysis and address questions concerning UEM Sunrise's operations, projects and financial conditions. They may also discuss matters relating to UEM Sunrise's governance and management.
- b. Secondary Spokespersons consists of the Chief Operating Officer (Commercial), Chief Operating Officer (Development), Head of Corporate Communication Department, Company Secretary of UEM Sunrise, and Senior Management ONLY in their capacity relating to specific businesses and responsibilities. This category of spokespersons may only communicate with the Stakeholders in connection with their specific areas of responsibility, unless authorised by a Primary Spokesperson to speak on other matters.
- c. Third Spokesperson is the Investor Relations officer for liaison with analysts, fund managers, investors, shareholders, and other groups of the financial community related thereto.
- d. No other person is authorised to act as a spokesperson for UEM Sunrise.

7. DISCLOSURE OF INFORMATION

- 7.1. While UEM Sunrise endeavours to provide as much information as possible to the Stakeholders, it must also be wary of the legal and regulatory framework governing the release of material and price-sensitive information.
- 7.2. All corporate disclosures take into account prevailing legislative restrictions and requirements as well the Stakeholders' need for timely release of price-sensitive information such as financial performance results and statements, material acquisitions, significant corporate proposals and other significant corporate events.
- 7.3. In all circumstances, UEM Sunrise is cautious not to provide undisclosed material information and continually stresses on the importance of timely and equal dissemination of information to the Stakeholders.

8. CONFIDENTIAL INFORMATION AND LEAKS

- 8.1. The Board and UEM Sunrise's employees must adhere to the Code of Ethics on confidentiality issued by UEM Sunrise at all times. Unless it is already in the public domain, all information regarding UEM Sunrise, its operations, financial condition and future prospects, will normally be regarded as material information, as such should be treated as confidential.

- 8.2. Access to confidential information will be restricted to those persons with a legitimate need for such information, determined by their duties and/or obligations to UEM Sunrise.
- 8.3. UEM Sunrise may provide unpublished material information to third parties, such as its auditors, bankers, lawyers or other professional advisors, as well as to outside parties connected to undisclosed major corporate developments. Unless adequate legal protection already exists, UEM Sunrise will normally require the execution of non-disclosure and confidentiality agreements.
- 8.4. When there is a leakage of material information, accidental or otherwise, corrective action will be taken in line with UEM Sunrise's organisation and authority structure. If appropriate, UEM Sunrise will make an announcement to Bursa Malaysia as soon as possible, to be followed by a press release. Other communication channels may also be used if necessary.

9. FORWARD LOOKING STATEMENTS

- 9.1. UEM Sunrise may provide forward-looking commentary and guidance from time to time to assist the Stakeholders in evaluating UEM Sunrise. Such commentary may be included in presentations, briefings for analysts or the media, or during road shows, and may also be contained in any accompanying press release.
- 9.2. Predictions of actual future financial results will not be given, but comment on future prospects, including the likelihood of meeting any publicised targets, may be provided in good faith.
- 9.3. Any forward-looking commentary and relevant written materials must include disclaimers i.e. advice not to rely on the data and information.

10. SHAREHOLDERS' RIGHTS

- 10.1. UEM Sunrise will facilitate the opportunity for shareholders to participate effectively in and vote at UEM Sunrise's general meetings. The shareholders will also be informed of the rules, including voting procedures that govern general meetings.
- 10.2. It will endeavour to put substantive resolutions and such resolutions mandated by Bursa Malaysia to vote by poll either by way of physical or electronic means, and make an announcement of the detailed results showing the number of votes cast for and against each resolution.
- 10.3. It will also request that external auditors attend the general meetings and be available to answer shareholders' questions on the conduct of the audit and the preparation and content of the auditors' report.
- 10.4. UEM Sunrise is committed to treating all its shareholders fairly and equitably and will recognise, protect and facilitate the exercise of shareholders' rights

and continually review and update such governance arrangements by adhering to relevant regulatory bodies' requirements and guidelines.

11. REVIEW OF POLICY

11.1. This Policy was adopted by the Board on 5 December 2017.

11.2. It will be reviewed as and when necessary with any material change as determined by the Managing Director/Chief Executive Officer to reflect current best practises in communication with the Stakeholders.