



Star Media Group Berhad
(Company no. 10894-D)

INVESTOR RELATIONS POLICY

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1.0 INTRODUCTION

- 1.1 Star Media Group Berhad (“Star Media” or the Company”) as a public listed company is obliged to provide information about itself, how it is governed, its operational and financial status and future prospects. The Company is committed to providing timely, orderly, consistent and credible information to the investors and potential investors so they can make properly informed investment decisions.

The purpose of this Investor Relations policy is to inform and guide Star Media’s relationship with its shareholders, investors and other stakeholders.

- 1.2 The dissemination of the Company’s information to all current and prospective shareholders as well as stakeholders shall adhere to the following principles:

- **Consistent:** All stakeholders will receive the same information, only formats may defer depending on audience and forum.
- **Transparent:** Information will be released, as far as possible, in a balanced and fair manner that is not misleading.
- **Timely:** Material information will be released as soon as it is known, unless there are exceptional, legitimate reasons to withhold, in which case the delay will be no longer than necessary.
- **Fair:** Equality of access to material information will be achieved through broad public dissemination, no stakeholder will be given undisclosed material information in any form.
- **Accurate:** Information should be complete and accurate when released and any material errors or omissions will be immediately corrected and clarified.
- **Coherent:** Information will be presented in a clear, factually accurate manner, avoiding ambiguity, jargon, legal and technical terms where possible.
- **Interactive:** The Company values dialogue with current and prospective shareholders. It also encourages an exchange of opinion between itself and principal stakeholders.

- 1.3 In the course of its Investor Relations activities, the Company will comply with all applicable securities laws and regulations. In addition to required information disclosures, the Company seeks to adopt a proactive stance of voluntary supplemental disclosure covering matters which are considered to have a potential impact on the investment decisions by interested parties. Through these activities, the Company seeks to build a strong and enduring positive relationship with the investment community.

2.0 SCOPE

- 2.1 This Policy applies to Star Media's Board of Directors, Management and employees of the Company.
- 2.2 This Policy covers material information concerning the Company as defined under Section 4.0 of this Policy.
- 2.3 The audience of "shareholders, stakeholders and the public in general" is very wide. The Company recognises this to include:
 - Shareholders and prospective investors;
 - Analysts, fund managers and investment bankers;
 - The financial press and other media;
 - Government and regulators;
 - Banks and creditors;
 - Public Listed Companies and intermediaries;
 - Business partners and service providers; and/or
 - Other organisations and special interest groups.

3.0 INVESTOR RELATIONS SPOKESPERSON(S) AND COMMUNICATION AUTHORITY

3.1 Roles and responsibilities within the Investors Relations Process

- 3.1.1 The Chain of command for the Investor Relations Process is depicted diagrammatically by way of Annexure A. Essentially there are four tiers of authority namely:
 - the Board of Directors;
 - the Audit Committee;
 - Primary Spokespersons and
 - Secondary Spokespersons

3.2 Authorised Spokespersons

- 3.2.1 In principle, all Star Media's IR communications go through the following IR spokespersons which are classified into two main categories:
 - Primary spokespersons; and
 - Secondary spokespersons.

But other spokespersons including Non-Executive Directors may also be appointed by the Board depending on requirements and content to be provided.

3.2.2 Primary Spokespersons

Primary spokespersons may communicate with all audience constituents, providing information, data and analysis and responding to questions concerning all aspects of the Company's operations and financial condition, its future prospects and its strategies. They may also discuss matters relating to the Company's governance and

management, as well as its products and services, and initiatives connected with the regulatory role of the Exchange, the general development of the securities market and its participants.

3.2.3 Secondary Spokespersons

Secondary spokesperson may only communicate with audience constituents in connection with their specific areas of responsibility within the Company, unless they are authorised to undertake broader communications by a Primary Spokesperson.

3.2.4 No other individuals may act as spokespersons for the Company.

3.2.5 The approving authority for any press statement on behalf of the Company is the Chairman of the Board and its issuance is to be carried out by the GCEO.

4.0 MATERIAL INFORMATION

4.1 Star Media discloses material information as appropriate in a transparent and timely manner in compliance with the Main Market Listing Requirements (“MMLR”) of Bursa Malaysia Securities Berhad (“Bursa Malaysia”). Material information includes any information that is reasonably expected to have a material effect on the:

- price, value or market activity of any of the Company’s shares; and/or
- investors’ decision in determining their choice of action, either to buy, sell or continue holding the Company’s shares or someone considering an investment in the Company’s shares.

4.2 Examples of events which may require immediate disclosure to Bursa Malaysia include but are not limited to the following:

- the entry into a joint venture agreement or merger;
- the acquisition or loss of a contract, franchise or distributorship rights;
- a change in the Board of Directors;
- the commencement of or the involvement in litigation and any material development arising from such litigation;
- the commencement of arbitration proceedings or proceedings involving alternative dispute resolution methods and any material developments arising from such proceedings;
- the purchase or sale of an asset;
- a change in capital investment plans;
- the making of a tender offer for another corporation’s securities;
- a change in general business direction;
- the entry into a memorandum of understanding; or
- the entry into any call or put option or financial futures contract.

4.3 Materiality of the information can be a subjective assessment and it is important that Star Media takes into account relevant factors such as:

- the anticipated impact of the information on Star Media’s entire scope of activities;

- the anticipated impact of the information on Star Media's financial position or performance; and
 - the relevance of the information on the factors that determine the price of Star Media's shares.
- 4.4 This Policy covers material information to be released, but is not limited to, the following communication platforms:
- Reports and documents provided to Bursa Malaysia and other regulators;
 - Materials and statements in the Company's Annual Reports, quarterly reports, press releases, letters and circulars to shareholders;
 - Presentations and speeches made or given by or on behalf of the Company;
 - Information on the Company's website;
 - Articles concerning the Company;
 - Correspondence and emails;
 - Verbal statements made to external parties in meetings, briefings, press conferences, or during telephone conversations; and
 - Interviews with the media.
- 4.5 The approving authority for the determination disclosure and announcement of material information to Bursa Malaysia, the media or public is either the Chairman of the Board, GCEO or the Company Secretary. Any announcement to be made to Bursa Malaysia will be guided by the MMLR of Bursa Malaysia.
- 4.6 Material information that has been publicly disclosed may be further disseminated at the discretion of the respective Spokesperson. The designated Spokespersons shall be accountable for all other non-material information disclosure at any engagement platforms.
- 4.7 Voluntary Disclosure – Star Media also discloses general corporate information other than material information, when we deem it may have a material impact on the investment decisions of our shareholders and investors as timely and as transparent as possible.

5.0 CONFIDENTIAL INFORMATION AND LEAKS

As a general rule, all information regarding the Company, its operations, financial condition and future prospects, should be regarded as material and price-sensitive, and must be treated as confidential unless it is already in the public domain.

To protect the confidentiality of information, access to information should be restricted only to those persons (employees, or third parties) who have a legitimate need for the information consistent with their duties or obligations to the Company.

Third Parties: Under certain circumstances, the Company may provide material information to third parties, which is not in the public domain. For example, the Company's auditors, bankers, lawyers or other professional advisors may require such information to properly execute their mandates.

In such instances, unless there are adequate existing legal protections, the Company will require the execution of non-disclosure and confidentiality agreements by these persons.

Electronic means of communications: Employees are discouraged from participating in any electronic forum for the exchange of information and comment, where there is any discussion of the Company's affairs.

Leakage & Accidental Disclosure: In the event of an information leakage, or the accidental disclosure of unpublished material information, the situation will be addressed in line with the Company's chain of authority and responsibility. If deemed necessary, the Company will make an appropriate announcement to the Exchange as soon as practicably possible, which may be followed by a press release and/or other communication modes.

6.0 ANNOUNCING MATERIAL INFORMATION

The Company will follow a step-by-step approach, on the same day, as shown below:

Step 1: Approval is given for release of material information in line with the chain of authority and responsibility.

Step 2: An announcement is made to the Exchange.

(Note: If the Company believes it would assist in having the news or information better understood and widely disseminated, the Exchange may be requested to temporarily suspend trading in the Company's securities, so that an announcement can be made during trading hours.)

Step 3: Issue of a Company press release and newswire services in Malaysia.

(Note: Except in a limited number of minor, administrative situations, any news or information which is announced to the Exchange will be followed by a press release.)

Step 4: A press conference or briefing/presentation for investors, analysts and the media may be convened.

(Note: This will usually take place following the announcement of the Company's Quarterly Reports (interim financial report) for the fiscal half-year and full year, as well as the announcement of any major corporate development.)

Step 5: The Company press release, and any presentation material produced for a press conference or briefing, are posted on the Company's website, and email copies are dispatched to persons on the Company's mailing list.

7.0 FINANCIAL REPORTS & THE ANNUAL GENERAL MEETING ("AGM")

- a) Quarterly Reports of interim financial results will be issued to the Exchange on the day of approval by the Board, in the format required by the Exchange. Thereafter, announcement on the Company's Quarterly Report will be posted on the Company's website, and a copy of the report will be emailed to Editorial for newspaper write-up.
- b) The Annual Report is managed within the Company as a special project, with Corporate Communication acting as co-ordinators.

The GCFO and Finance Department are responsible for the financial statements, notes and related information whilst the Company Secretary is responsible for compliance with Bursa Malaysia MMLR. Corporate Communication is responsible for design, layout, production and despatch (with

assistance from Company Secretary and co-ordination with the Company's share registrar).

Approval of the Annual Report follows the chain of authority and responsibility. The Annual Report will be published and distributed in both printed and electronic format. The complete Annual Report in a printed format will be delivered to those who notify the Company that they would like to receive the full report. An electronic copy of the Annual Report will also be made available on the Company's website.

- c) The AGM is treated as a major Company event. The Company Secretary is responsible for shareholder management, Corporate Communication for event management, and Finance team for presentation materials.

Notice for the meeting will be announced on the Exchange and in a daily newspaper and will be in compliance with the MMLR. The content of the AGM will concentrate on the Company's resolutions, financial performance, development, strategy, and any relevant operational matters of interest to shareholders.

The AGM is regarded as an important forum, especially for individual shareholders. The Company believes it should provide an opportunity for shareholders to engage with the Board and senior management, and to gain a fuller understanding of the Company's affairs.

As such, meetings will be conducted in a manner which permits reasonable enquiry, and the Company will endeavour to provide shareholders with all relevant information, which may include written answers. The minutes of the AGM will be posted on the Company's website in compliance with the MMLR of Bursa Malaysia.

8.0 REPORTS & RUMOURS

Analysts' reports: Analysts will often contact the Company to verify factual information and to validate assumptions. The Company will not evaluate or comment on any analysts reports concerning the Company. However, if a report contains factual errors or assumptions which are inconsistent with previously announced information, those errors will be pointed out. The Company will not endorse any analyst's report, nor will it endeavour to influence the opinions or conclusions of the analyst.

The Company may also circulate such reports internally to its Board and senior management to assist them in understanding how the market and outsiders view the Company.

Rumours: Rumours in the markets and press about the Company may have a potential impact on the Company's share price. It is the Company's policy not to respond to such reports/rumours unless they appear to contain material information that may influence the Company's share price.

When a report or rumour about the Company contains material errors, the Company will issue an announcement to the Exchange to deny or clarify the report or rumour, and provide sufficient supporting information. In general, the Company will take a proactive approach to the addressing of reports and rumours, so as to minimise uninformed speculation and promote an orderly market in its securities.

9.0 FORWARD-LOOKING INFORMATION & COMMENT

- 9.1 To assist the investment community in evaluating the Company, a forward-looking comment may be given in the Quarterly Report. It may also be included in any subsequent press release or briefing. The Company will not normally provide any prediction as to actual future financial results, but comment may be given on future prospects, as well as on the likelihood of meeting any publicised targets, such as key performance indicators.
- 9.2 Any forward-looking information or comment must be clearly qualified by a disclaimer or guidance not to rely on the data. In the case of a briefing or presentation, this will be contained in the written materials as well as being stated or highlighted verbally at the beginning of the briefing or presentation.
- 9.3 If the Company becomes aware of a significant variation between actual financial data and the forward-looking information previously provided, the Company will consider the significance of the variation, whether the expectations of the investment community differ materially from the Company's actual results, and whether a decision not to issue a clarifying announcement would amount to the Company misleading the market.

10.0 MAJOR CORPORATE DEVELOPMENTS

Major corporate developments, such as a merger or acquisition or the launch of a significant new business or product, will always attract special attention. The Company will strictly enforce its procedures for the protection of confidentiality until such time as the development has received all requisite internal approvals. Thereafter, special attention will be paid to ensure the widest and most complete dissemination of information concerning the development, in line with the provisions of this Policy and the Listing Requirements of the Exchange.

11.0 INSIDERS

- 11.1 Anyone who has access to material information about the Company, its financial condition and its operations, is regarded as an Insider. Material information which is in the possession of an Insider and has not been disclosed to the Exchange and the investing public is Inside Information.
- 11.2 Insiders may not deal in the Company's securities while in possession of Inside Information, nor may they pass on that information to help another person deal in the Company's securities.

The relevant provisions of the Capital Markets and Services Act 2007 apply to all Insiders.

11.3 Closed Period

- a) As prescribed by Chapter 14 of the MMLR of Bursa Malaysia, any "affected persons" must comply to the procedure during closed period should they wish to transact in the shares of the Company during this period.

Chapter 14 of the MMLR of Bursa Malaysia defines “affected persons” as a person who has access or is privy to price sensitive information in relation to the Company. For Star Media’s purpose this shall include, but is not limited to, Directors, Principal Officers of the Company (including the key officers of subsidiary companies) and any other person as identified by Star Media Board from time to time.

- b) Notices on the closed period for trading in the Company’s shares are sent by the Company Secretary to the affected persons on a quarterly basis specifying the timeframe during which they are prohibited from dealing in the Company’s shares, unless they comply with the relevant procedures for dealings during closed period as stipulated in the MMLR of Bursa Malaysia.

12.0 Company’s IR Website

- 12.1 The Company’s IR website is one of the most important platform for shareholders and investors to look for relevant information. Without consistent oversight, it can become outdated or contain inaccuracies. The Company has to ensure its IR website is accurate, complete, current and in compliance with relevant regulations and good governance practices.
- 12.2 Corporate Communication and Company Secretary are generally responsible for the content, presentation and the prompt updating of the Company website. Press releases, presentation materials for briefings or meetings with investors, analysts and the media, will be posted on the website, where necessary. The website will provide for email communication with the Company, and for stakeholders to register their interest in information about the Company, so that they may be alerted of developments or breaking news.

13.0 Policy Matters

This Policy is adopted by the Board on 28 August 2019 and it will be reviewed from time to time as determined by the Board or the GCEO.

Annexure A: The Chain of command of the IR Process

