



CRITICAL HOLDINGS BERHAD

(Registration No. 202201031781 (1477478-K))
(Incorporated in Malaysia)

CORPORATE COMMUNICATION POLICY

Policy Statements

Critical Holdings Berhad (“CHB” or “Company”) recognises the importance of continuous stakeholder engagement to the sustainability of its business.

This Corporate Communication Policy is intended as a guideline for the Company in fulfilling its obligations to ensure that all information relevant and material to the Company’s shareholders and the market is disclosed in a timely manner, while protecting the Company’s commercially sensitive information.

The aim is to represent the Company fairly and accurately, so that investors and potential investors can make properly informed investment decisions.

The Company adheres to the following 6 specific corporate disclosure policies which are in accordance with Paragraph 9.02 of Bursa Malaysia Securities Berhad (“Bursa Malaysia”)’s ACE Market Listing Requirements:

- Immediate disclosure of material information;
- Thorough public dissemination;
- Clarification, confirmation or denial of rumours or reports;
- Response to unusual market activity;
- Unwarranted promotional disclosure activity; and
- Insider trading.

Scope

This Policy extends to all directors, employees and officers of the Company, those authorised to speak on its behalf, and all other insiders. It covers disclosure in:

- continuous disclosure documents filed with securities regulators, including financial and non-financial documents, including annual information forms, proxy materials, management’s discussion and analysis and written statements made in the Company’s annual and quarterly reports;
- documents issued in connection with an offering of the Company’s securities;
- press releases and material change reports;
- articles concerning the Company;
- letters to shareholders;
- presentations by senior management and other employees; and
- the Company’s website and other electronic communications

Nevertheless, it also extends to oral statements made in:

- meetings;
- telephone conversations with analysts, investors and potential investors;
- interviews with the media;
- speeches;
- press conferences;
- investor presentations; and
- conference calls.

Communications Commitments

The Company will make every effort to ensure all material information concerning the Group is made as freely and widely available as possible.

The Company encourages an exchange of opinion between itself and its principal stakeholders and will organise its communications to facilitate that dialogue. The Company also encourages shareholders to attend and participate in all general meetings of the Company, such as annual general meetings and extraordinary general meetings, in which all shareholders will be entitled to convey their opinion or queries about the Group's affairs to the management of the Company. The Company will ensure all notices for general meetings are delivered to shareholders on a timely basis and ensure all notices for general meetings are accompanied with the relevant explanatory notes to provide the shareholders of the Company with the necessary salient information on the general meetings.

Designated Spokespersons

Communication with stakeholders, media and financial markets must be aligned with the Company's official stance and strategy and must only be done by duly authorised Company's Spokespersons (Chief Executive Director, Chief Operating Officer, Financial Controller or any other person as authorised by the Board of Directors from time to time). Any person who is not authorised to represent the Company must decline to comment. Disciplinary action will be taken to any employee who does not comply with this rule.

Material Information

Material information is any information about the Company which might reasonably be expected to have a material effect on:

- the market price or value of the Company's securities, or activity in the trading of its securities; or
- a decision to buy, sell or continue holding the Company's securities which are made by an existing holder of those securities, or someone considering an investment in those securities; or
- the anticipated impact of the information on the Company's entire scope of activities; or
- the anticipated impact of the information on the Company's financial performance.

For the purpose of this Policy, material information should follow the guidelines and interpretation of applicable rules and regulations of Bursa Malaysia's ACE Market Listing Requirements.

Materiality can be difficult to evaluate on occasion, however. The Company will always lean towards an assessment of the likely effect of the information on the price of the Company's securities, rather than a determination of whether the circumstances or events are measurable and trigger the materiality thresholds in the Bursa Malaysia's methods for percentage ratio calculation.

Confidentiality

All Company's documentation, correspondence and Group-related information, unless and until publicly available must be treated as material and confidential. Non-public information from or concerning suppliers, customers, employees, agents, consultants and other parties must also be protected in accordance with legal and contractual requirements.

Immediate Disclosure of Material Information

Material information will be announced immediately to Bursa Malaysia first and made available at Company's website at <https://critical-eng.com>.

Thorough Public Dissemination

The Company will ensure releasing material information to the public in a manner designed to obtain its fullest possible public dissemination.

The Company will also ensure that no disclosure of material information is made to a selective person or group of persons unless such information has previously been fully disclosed and disseminated to the public.

Clarification, Confirmation or Denial of Rumours or Reports

Whenever the Company becomes aware of a rumour or report, true or false, that contains material information, the Company will make a due enquiry and immediately clarify publicly whether to confirm or deny the rumour or report.

Response to Unusual Market Activity ("UMA")

Whenever there is UMA of its securities traded, the Company must, upon query from Bursa Malaysia, undertake due enquiry with the relevant persons such as the Directors or major shareholders to determine the cause and issue a clarifying announcement.

Unwarranted Promotional Disclosure Activity

The Company must refrain from any form of promotional disclosure activity which may mislead investors or cause unwarranted attention and price movement in the securities of the Company.

Insider Trading

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 Bursa Malaysia and the investing public is Inside Information.

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.

Forward-Looking Information

The Company will not disclose forward-looking information unless it has a reasonable basis for the forward-looking information. Where the Company elects to disclose forward-looking information in continuous disclosure documents, speeches, investor conference calls or otherwise, it shall include with their forward-looking statements, appropriate statements of risks and cautionary language.

The Company Website

The Company will use its website as one of its primary communication conduits to enhance existing modes of disseminating information, but not as a substitute for existing modes.

The website will also provide the necessary channel for email communication with its investor and potential investor.

Compliance

The Company is committed to comply with all applicable laws and stock exchange rules on the disclosure of financial and other information about the Company. In case of contradiction between this policy and applicable laws, applicable laws shall prevail.