



PARAMOUNT CORPORATION BERHAD

(Registration No. 196901000222 (8578-A))

INSIDER DEALING POLICY

(Revised: 3 August 2022)

1. INTRODUCTION

The Board of Directors (**the Board**) of Paramount Corporation Berhad (**Paramount** or **the Company**) is committed to ensuring that measures are put in place to prevent the occurrence of insider dealing within the Company and subsidiary companies (**the Group**) although there can be no assurance that insider dealing can be completely prevented.

There are three (3) elements that need to be fulfilled to constitute insider dealing, i.e.:

- i) The trading is effected pursuant to knowledge of relevant but non-public material **information** regarding the Company and/or the Group;
- ii) The trading is effected by an **insider**;
- iii) The effect of that **information** is that when it is made available to the public, it will affect the price or volume of transaction of the listed securities in the Company on Bursa Malaysia Securities Berhad (**BMSB**).

2. OBJECTIVES

This policy aims to:

- i) prevent insider dealing of listed securities in the Company;
- ii) ensure transparency and fairness in dealing with all stakeholders of the Group;
- iii) maintain the confidentiality of price sensitive information; and
- iv) promote adherence to the Capital Markets and Services Act 2007 (**CMSA**), the Main Market Listing Requirements of BMSB, the Practice Notes and Issuers Communication Guidance Notes issued from time to time by BMSB (collectively **Listing Requirements**) and the best practices contained in the Malaysian Code on Corporate Governance 2021 (**MCCG**).

3. DEFINITIONS

- i) **insider dealing** refers to the purchase or sale of listed securities in the Company by an insider or by a person acting for an insider with knowledge of relevant but non-public material information regarding the Company and/or Group. The insider is in a position to make significant gains by selling or buying the securities before the information that might affect the price of those securities (price-sensitive information) is made public.
- ii) **securities**, pursuant to Section 2 of the CMSA, refers to shares in or debentures of the Company, and any right, option or interest in respect thereto that are listed on BMSB.
- iii) A person is an **insider** if that person:
 - a) being an employee, officer or board member of any company within the Group or through having access to the information by virtue of his or her employment, office or profession;

- b) possesses information that is not generally available and which on becoming available would or would tend to have a material effect on the price or volume of transaction of the securities; and
- c) knows or ought reasonably to know that the information is not generally available.
- iv) **information**, pursuant to Section 183 of the CMSA, refers to:
- a) matters of supposition and other matters that are insufficiently definite to warrant being made known to the public;
- b) matters relating to the intentions, or likely intentions, of a person;
- c) matters relating to negotiations or proposals with respect to commercial dealing or dealing in securities;
- d) information relating to the financial performance of the Group;
- e) information that a person proposes to enter into, or has previously entered into one or more transactions or agreements in relation to the securities or has prepared or proposes to issue a statement relating to such securities; and
- f) matters relating to the future of the Group.
- v) **material information**, pursuant in paragraph 9.03 (2) of the MMLR, refers to information that has a material effect on the price, value and market activity of the listed securities in the Company, and it includes information that concerns the assets, liabilities, business, financial condition and prospects of the Group as well as on events affecting a present or potential dilution of the rights and/or interests of the shareholders of the Company. Examples of such transactions are the signing of a joint venture agreement, the signing of a sale and purchase agreement for the acquisition or disposal of an asset for a substantial consideration (not less than 5% of the total assets of the Company on a consolidated basis) that requires an immediate announcement to BMSM.
- vi) **deal or dealing**, pursuant to paragraph 14.02 (c) of the MMLR, refers to any one or more of the following actions:
- a) acquiring or disposing of securities or any interest in securities;
- b) subscribing for or underwriting securities;
- c) making or offering to make with any person, or inducing or attempting to induce any person to enter into or to offer to enter into –
- any agreement for or with a view to acquiring or disposing of securities or any interest in securities;
 - any agreement for or with a view to subscribing for or underwriting any securities; or
 - any agreement, the purpose or avowed purpose of which is to secure a profit to any of the parties from the yield of securities or by reference to fluctuations in the values of securities; and
- d) granting, accepting, acquiring, disposing of, exercising or discharging an option (whether for the call or put or both) or any other right or obligation, present or future, conditional or unconditional, to acquire or dispose of securities or any interest in securities.
- vii) **closed period**, pursuant paragraph 14.02 (b) of the MMLR, refers to:
- a) a period of time commencing 30 calendar days before the targeted date of announcement up to the date of announcement of the following to BMSB:
- the Group's quarterly results;
 - the Company's annual report and audited financial statements; and

- a) in the case of transactions involving material information, the date on which the person is in possession of such information until the date of announcement of the transaction by the Company to BMSB.
- viii) **affected person**, pursuant to paragraph 14.03 of the MMLR, refers to all directors, chief executives who are not directors, chief financial officers or any other employees of the Group who have access or are privy to price-sensitive information pertaining to the Group.

4. PROHIBITIONS

- i) Pursuant to the CMSA, an insider is prohibited from:
 - a) acquiring, disposing of, or procuring, directly or indirectly, or entering into an agreement for or with a view to the acquisition or disposal of any securities;
 - b) encouraging or discouraging other persons to deal in any of the securities or exercise any options or other rights over such securities; and
 - c) disclosing, directly or indirectly, whether through electronic or manual channels, to any person who do not need such information to discharge their duties.
- ii) Any person who commits insider dealing may be subject to certain criminal and civil actions under Malaysian laws which include the CMSA.

5. DEALING DURING A CLOSED PERIOD

All affected persons are required to abide by the following policy and procedure, which are in line with the provisions of the MMLR on Dealing in Listed Securities (Chapter 14 of the MMLR):

- i) All affected persons who are in possession of any price-sensitive information must not deal during a closed period.
- ii) All affected persons who are not in possession of any price-sensitive information may engage in dealings during a closed period provided that the following procedures are complied with:
 - a) the affected person shall give notice in writing of his/her intention to deal to the Company Secretary at least two (2) market days prior to the targeted date of dealing. Upon receipt of the notice, the Company Secretary will release an announcement on the affected person's intention to deal to Bursa Malaysia after the end of the trading hours on the day of receipt of the notice.
 - b) The intended dealing can only be effected one (1) full market day after the date of the announcement referred to in subparagraph (a) above.
 - c) The affected person is required to declare to the Company Secretary within one (1) full market day after the dealing has occurred the details of his transactions for announcement to BMSB.

6. REVIEW

The Board shall review and assess the effectiveness of this policy once in every three (3) years or as and when the need arises. Any recommendation for revision shall be proposed by management to the Board for approval.