

Investor Relations ("IRs") Policy

1. Introduction

As a public listed company, VSTECS Berhad (formerly known as ECS ICT Berhad) ("VSTECS" or the "Company") and its subsidiaries ("The Group") are committed to provide accurate, timely, consistent and fair disclosure of corporate information to enable informed and orderly market decision by investors. This information is directed to a diverse audience of shareholders, stakeholders and the public generally.

In formulating this policy, the Company has taken into account the recommendations contained in the Malaysian Code on Corporate Governance (MCCG) 2012 and its disclosure obligations contained in the Listing Requirements of Bursa Malaysia Securities Berhad.

2. Rationale and Objective

To develop an effective IR programme and strategy to communicate the Corporate vision, strategies, developments, financial plans and prospects to investors, financial community and other stakeholders fairly and accurately and to obtain feedback from the stakeholders.

This policy also aims to:

- Develop and maintain a positive relationship with all the shareholders and stakeholders through active two-way communication;
- Promote and demonstrate a high standard of integrity and transparency through timely, accurate, quality and full disclosure.

3. IR Structure and Responsibility

The Company has established the following IR structure and responsibility for the implementation of IR programme and strategy:-

Primary Spokespersons:

- i) Executive Chairman
- ii) Chief Executive Officer

The Company's Executive Chairman and Chief Executive Officer have been appointed to communicate with audience constituents and respond to questions in relation to the corporate vision, strategies, developments, future prospects, financial plans and operation matters.

Secondary Spokesperson:

i) Chief Financial Officer/Company Secretary (Internal)

The Chief Financial Officer and Internal Company Secretary may only communicate to audience constituents on information already in the public domain, unless they are authorised by the Primary Spokespersons to undertake broader communications.



4. Mode of Disclosure

The Company makes use of a broad range of communication channels to disseminate information regarding the Company. These would include:

- 4.1. Electronic facilities provided by Bursa Malaysia Securities Berhad;
- 4.2. Press releases:
- 4.3. Corporate website;
- 4.4. Email;
- 4.5. Road shows or events; and
- 4.6. Annual General Meeting

5. IR Programme and Strategies

The Company has the following programmes and strategies in place to bridge and enhance the relationship with investors or potential investors:-

5.1. Announcement of Material Information and Press Release

After the approval from Board of Directors on releasing of material information, on the same day, after the market closure, an announcement is made to the Bursa Exchange. The investors in the contact list will be informed verbally or by email and/or a company press release will be issued to all major newspapers after the announcement. If necessary, meetings or presentations for investors and analysts will be conducted.

5.2. Annual General Meeting & Press Conference

The Annual General Meeting is held to communicate with the shareholders on the Company's performance, strategy, outlook and other operational matters. The Board will identify a Senior Independent Non-Executive Director to whom shareholders can convey their concerns and seek clarification from the Board.

5.3. Annual and Quarterly Financial Reports

The quarterly interim financial results are prepared in the format which is in compliance with the Listing Requirements and is published on the Bursa Exchange after approval by the Board on the same day.

The Annual Report will be printed and distributed to shareholders and other interested group by either softcopy or hardcopy.

5.4. Meetings or Interviews with Investors, Analysts and Media

The primary spokespersons will meet the substantial shareholders, analysts or media from time to time to update them on the Company's performance and strategy. The spokespersons must exercise care to ensure only information already in public domain is communicated in the meetings or interviews.



5.5. Participate in Programmes or Activities Organised by Bursa Malaysia and Other Related Bodies

The Company may participate in events organised by the Bursa Malaysia and other related bodies, such as road show and IR activities, to promote the Company to potential investors.

5.6. Participate in Investor Relations Web Portal

Create opportunity for the Company to outreach to potential investors with the creation of an IR web portal. Internet is a power tool to communicate the corporate strategy, developments, updates, performance and other events to audience constituents timely and effectively. The web portal shall incorporate the Company's profile and history, financial information and other information which is of interest to the investors and financial community.

6. Reports and Rumours

6.1. Analysts' reports

It is the Company's policy not to provide focused guidance to analysts in their efforts to develop their financial reports or earnings estimate of the Company. The Company will point out factual errors or assumptions which are inconsistent with previously announced information. However, the Company will not review and comment on the analysts' reports, its conclusions or investments recommendations.

6.2. Rumours

It is the Company's policy not to respond or comment on market rumours and speculation, unless they appear to contain material information, or may be expected to affect the price of the Company's securities or trading activity in those securities.

When a report or rumour about the Company contains material errors, the Company will issue an announcement to Bursa Malaysia Securities Berhad to deny or clarify the matter, and provide sufficient supporting information in accordance with the Listing Requirements.

7. Obtaining Feedback

The Company has developed various channels (email, IR's contact number or constructive engagements) for shareholders and major stakeholders to provide their comments and feedback in relation to Company's operational, performance, governance and strategic matters.

The Company will consider the relevant comments and feedback received in establishing its corporate strategy.

8. Continuing Training Programme

Continuous learning such as attending seminar and training courses will be recommended on an on-going basis to uplift the competencies and skills of the spokespersons and enable them to keep abreast with the micro and macro changes.



9. Contact Details for general enquiries related to IRs matters

Ms Eva Loh at syloh@vstecs.com.my

Tel: +603 - 6286 8201

10. Periodic Review and Disclosure

- 10.1. The Investor Relations Policy is to be regularly reviewed by the Board as and when required and communicate the new changes to all relevant parties.
- 10.2. The Company shall disclose this policy in its Corporate Website.
- 10.3 This Policy is dated 25 April 2016 and supersedes any terms of reference previously in force.
- * Updated on 30 November 2018 subsequent to the change of company name from "ECS ICT Berhad" to "VSTECS Berhad" with effect from 30 November 2018.