

Corporate Disclosure Policies and Procedures

1. Introduction

In formulating this policy, Notion VTec Berhad (“Notion” or “the Company”) has taken into account the recommendations contained in the Malaysian Code on Corporate Governance 2017 (MCCG) and the disclosure obligations contained in the Main Market Listing Requirements (“MMLR”) of Bursa Malaysia Securities Berhad (“Bursa Securities”).

2. Investor Relations (“IR”) Structure and Responsibility

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

Spokespersons:

Primary : Chairman of the Board (“Chairman”)
Secondary : Chief Financial Officer (“CFO”)

The Company’s Chairman and CFO have been appointed to communicate with audience constituents and respond to questions in relation to the corporate vision, strategies, developments, future prospects, financial results and plans, operation matters, etc.

3. Mode of Disclosure

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

- 3.1.1. Electronic facilities provided by Bursa Securities;
- 3.1.2. Press releases;
- 3.1.3. Corporate website;
- 3.1.4. Emails;
- 3.1.5. News conferences, road shows, industry events and investor conferences;
- 3.1.6. General Meetings; and
- 3.1.7. Oral statements made in group meetings and individual meetings with members of the investment community (which include analysts, investors, investment dealers, brokers, investment advisers and investment managers) or with employees.

4. 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:-

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4.1. Announcement of Material Information

After the approval from the Board of Directors on releasing of material information, an announcement is made to the Bursa Securities. 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.

4.2. Annual General Meeting or Extraordinary General Meeting and Press Conference

The Annual General Meeting / Extraordinary General Meeting / Press Conference is held to communicate with the shareholders on the Company's performance, strategy, proposed corporate exercises, outlook, operational matters, etc.

4.3. Annual and Quarterly Financial Reports

The quarterly interim financial results are prepared in the format which is in compliance with the MMLR and is published on the Bursa Securities after approval by the Board on the same day and also available on the corporate website of the Company.

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

4.4. Meetings or Interviews with Investors, Analysts and Media

The spokespersons will meet the shareholders, analysts or media to update them on the Company's performance, strategy, development, etc.

4.5. Participate in Investor Relations Web Portal

The Company has established a company website including the creation of an IR web portal to reach out to current and potential investors. It creates 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.

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5. Reports and Rumours

5.1. 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.

5.2. 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 misinformation, or may be reasonably 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 Securities to deny or clarify the matter, and provide sufficient supporting information in accordance with the MMLR.

6. Maintaining Confidentiality

Any employee privy to confidential corporate information is prohibited from communicating such information to anyone else, unless it is necessary to do so in the course of business or required by law (provided always the employee must give prior notification to the Company if he/she is compelled by law to make disclosure). Efforts will be made to limit access to such confidential information to only those who "need to know" the information.

Outside parties privy to undisclosed material information concerning the Company will be told that they must not divulge such information to anyone else. Management shall ensure that such outside parties confirm their commitment to non-disclosure under a written confidentiality agreement.

The Company will only withhold material information from the public for legitimate business or regulatory purposes. These include:-

- When immediate disclosure would prejudice the ability of the Company to pursue its corporate business objectives;
- When the facts are in a state of flux and a more appropriate timing for disclosure is imminent; and
- Where company or security laws restrict such disclosure.

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7. Obtaining Feedback

The Company has developed various channels for shareholders and major stakeholders to provide their comments and feedback. 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 going basis to uplift the competencies and skills of the spokespersons and enable them to keep abreast with the micro and macro changes.

9. Periodic Review and Disclosure

9.1. The Company shall review this policy as and when is necessary and communicate the new changes to all relevant parties.

9.2. The Company shall disclose this policy in its Company's website.

10. Contact Details

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This Corporate Disclosure Policies and Procedures has been approved and adopted by the Board on 23 August 2018.