

D.1 Transparent ownership structure			Y/ N	Reference/ Source document
D.1.1	Does the information on shareholdings reveal the identity of beneficial owners, holding 5% shareholding or more?	OECD Principle V: Disclosure and Transparency (A) Disclosure should include, but not limited to, material information on: (3) Major share ownership and voting rights, including group structures, intra-group relations, ownership data, and beneficial ownership. ICGN 7.6 Disclosure of ownership	Y	GENERAL INFORMATION SHEET
D.1.2	Does the company disclose the direct and indirect (deemed) shareholdings of major and/or substantial shareholders?		Y	GENERAL INFORMATION SHEET
D.1.3	Does the company disclose the direct and indirect (deemed) shareholdings of directors (commissioners)?		Y	GENERAL INFORMATION SHEET
D.1.4	Does the company disclose the direct and indirect (deemed) shareholdings of senior management?		Y	GENERAL INFORMATION SHEET
D.1.5	Does the company disclose details of the parent/holding company, subsidiaries, associates, joint ventures and special purpose enterprises/ vehicles (SPEs)/ (SPVs)?		Y	FINANCIAL REPORTING FRAMEWORK - COMPANY PROFILE PAGE 2

D.2 Quality of Annual Report				
	Does the company's annual report disclose the following items:			
D.2.1	Key risks	"OECD Principle V (A): (1) The financial and operating results of the company; (2) Company objectives, including ethics, environment, and other public policy commitments; (3) Major share ownership and voting rights, including group structures, intra-group relations, ownership data, beneficial ownership; (4) Remuneration policy for members of the	Y	AUDITED FINANCIAL STATEMENT
D.2.2	Corporate objectives		Y	AUDITED FINANCIAL STATEMENT
D.2.3	Financial performance indicators		Y	AUDITED FINANCIAL STATEMENT
D.2.4	Non-financial performance indicators		Y	AUDITED FINANCIAL STATEMENT
D.2.5	Dividend policy		Y	AUDITED FINANCIAL STATEMENT
D.2.6	Details of whistle-blowing policy		Y	HANDBOOK OF THE COMPANY
D.2.7	Biographical details (at least age, qualifications, date of first appointment, relevant experience, and any other directorships of listed companies) of directors/commissioners		Y	PROFILE OF VSIC DIRECTORS
D.2.8	Training and/or continuing education programme attended by each director/commissioner		Y	
D.2.9	Number of board of directors/commissioners meetings held during the year		Y	ANNUAL STOCKHOLDER'S AND ORGANIZATIONAL MEETINGS

D.2.10	Attendance details of each director/commissioner in respect of meetings held	for members of the board and key executives, including their qualifications, the selection process, other company directorships	Y	ANNUAL STOCKHOLDER'S MEETING
D.2.11	Details of remuneration of each member of the board of directors/commissioners		Y	
Corporate Governance Confirmation Statement				
D.2.12	Does the Annual Report contain a statement confirming the company's full compliance with the code of corporate governance and where there is non-compliance, identify and explain reasons for each such issue?	OECD PRINCIPLE V (A) (8) UK CODE (JUNE 2010): Listing Rules 9.8.6 R (for UK incorporated companies) and 9.8.7 R (for overseas incorporated companies) state that in the case of a company that has a Premium listing of equity shares, the following items must be included in its Annual Report and accounts: a statement of how the listed company has applied the Main Principles set out in the UK CG Code, in a manner that would enable shareholders to evaluate how the principles have been applied; a statement as to whether the listed company has complied throughout the	Y	

D.3. Disclosure of related party transactions (RPT)				
D.3.1	Does the company disclose its policy covering the review and approval of material/significant RPTs?	OECD Principle V: Disclosure and Transparency	Y	

D.3.2	Does the company disclose the name of the related party and relationship for each material/significant RPT?	(A) Disclosure should include, but not limited to, material information on: (5) Related party	Y	
D.3.3	Does the company disclose the nature and value for each material/significant RPT?		Y	

D.4 Directors and commissioners dealings in shares of the company				
D.4.1	Does the company disclose trading in the company's shares by insiders?	<p>OECD Principle V (A): (3) Major share ownership and voting rights</p> <p>ICGN 3.5 Employee share dealing Companies should have clear rules regarding any trading by directors and employees in the company's own securities.</p> <p>ICGN 5.5 Share ownership Every company should have and disclose a policy concerning ownership of shares of the company by senior managers and executive directors with the objective of aligning the interests of these key executives with those of shareholders.</p>	N	

D.5 External auditor and Auditor Report				
D.5.1	Are audit fees disclosed?	OECD Principle V (C): An annual audit should be conducted by an independent,	Y	AUDITOR'S FEE
	<i>Where the same audit firm is engaged for both audit and non-audit services</i>			
D.5.2	Are the non-audit fees disclosed?		N	

D.5.3	Does the non-audit fee exceed the audit fees?	competent and qualified, auditor in	N	
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D.6 Medium of communications				
<i>Does the company use the following modes of communication?</i>				
D.6.1	Quarterly reporting	OECD Principle V (E): Channels for disseminating information should provide for equal,	Y	Statement of Paid-Up Capital, Reserves and Investments, Financial Reporting Framework, RBC 2
D.6.2	Company website		Y	VSIC WEBSITE
D.6.3	Analyst's briefing		N/A	DEFAULT PER IC CIRCULAR NO. 2015-23
D.6.4	Media briefings /press conferences		Y	

D.7 Timely filing/release of annual/financial reports				
D.7.1	Are the audited annual financial report / statement released within 120 days from the financial year end?	OECD Principle V (C) OECD Principle V (E) OECD Principle V-(A).	Y	COVER SHEET OF AUDITED FINANCIAL STATEMENT
D.7.2	Is the annual report released within 120 days from the financial year end?		Y	
D.7.3	Is the true and fairness/fair representation of the annual financial statement/reports affirmed by the board of directors/commissioners and/or the relevant officers of the company?	ICGN 7.2 Timely disclosure ICGN 7.3 Affirmation of financial statements	Y	STATEMENT OF MANAGEMENT'S RESPONSIBILITY FOR FINANCIAL STATEMENTS

D.8 Company website				
<i>Does the company have a website disclosing up-to-date information on the following:</i>				
D.8.1	Business operations	OECD Principle V (A)	Y	VSIC WEBSITE
D.8.2	Financial statements/reports (current and prior years)		OECD Principle V (E)	Y
D.8.3	Materials provided in briefings to analysts and media	ICGN 7.1 Transparent and open communication	N/A	
D.8.4	Shareholding structure		Y	GENERAL INFORMATION SHEET
D.8.5	Group corporate structure		Y	GENERAL INFORMATION SHEET
D.8.6	Downloadable annual report		Y	VSIC WEBSITE
D.8.7	Notice of AGM and/or EGM	ICGN 7.2 Timely disclosure	Y	NOTICE OF ANNUAL STOCKHOLDER'S AND ORGANIZATIONAL MEETINGS
D.8.8	Minutes of AGM and/or EGM		Y	MINUTES OF ANNUAL STOCKHOLDER'S AND ORGANIZATIONAL MEETINGS

D.8.9	Company's constitution (company's by-laws, memorandum and articles of association)		Y	AMENDED BY-LAWS & ARTICLES OF INCORPORATION
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D.9 Investor relations				
D.9.1	Does the company disclose the contact details (e.g. telephone, fax, and email) of the officer / office responsible for investor relations?	ICGN 7.1 Transparent and open communication	N/A	DEFAULT PER IC CIRCULAR NO. 2015-23