ASPEN (GROUP) HOLDINGS LIMITED
Company Registration No.: 201634750K
(Incorporated in the Republic of Singapore)

RESPONSE TO QUESTIONS FROM THE SECURITIES INVESTORS ASSOCIATION (SINGAPORE) ON THE COMPANY'S FY2026 ANNUAL REPORT

The Board of Directors (the "**Board**") of Aspen (Group) Holdings Limited (the "**Company**", and together with its subsidiaries, "**Aspen**" or the "**Group**") refers to the questions raised by the Securities Investors Association (Singapore) ("**SIAS**") relating to the annual report published by the Company on 8 October 2026 and appends the replies as follows:-

SIAS Question 1

FY2026 revenue was RM201.2 million, comprising RM123.2 million from progressive billings for properties under development and RM78.0 million from sales of completed inventories, including Vivo Executive Apartment and Viluxe Phase 1, and other revenue, including the sale of development land.

(i) Versa: Of the 980 residential units, how many have been sold under binding sale and purchase agreements, and what is the percentage and total value of contracted sales against the project's gross development value (GDV) of RM429.1 million?

(ii) Viluxe: Phase 1 of the project was completed in June 2024, with the certificate of completion and compliance obtained in May 2024. Against the projected GDV of RM396.9 million, what proportion of Phase 1's GDV has been secured through contracted sales and how many of the 174 units in Phase 1 remain unsold? What factors will determine when management proceeds with future phases?

(iii) Sales progress disclosure: Will the board commit to disclosing, in future annual reports, the number of units sold, contracted sales value and sales progress by development? This would enable shareholders to assess demand and the group's exposure to unsold inventory.

In addition, the group launched its first serviced apartment development in Aspen Vision City, Mezon @ Park Enclave, and finalised the masterplan for Rivanis. Developed in partnership with Kerjaya Prospek Group Berhad and in collaboration with Railway Assets Corporation (RAC), Rivanis is a transit-oriented, mixed-use development in Perai, Penang.

(iv) Mezon @ Park Enclave: How many units have been sold under binding sale and purchase agreements, and how does this compare with management's initial sales expectations for the group's first serviced apartment? What is the typical profile of the buyers?

(v) Rivanis: With a 45% stake in the project, what capital commitments, development responsibilities and management resources will the group contribute? How will

responsibilities be allocated among the partners, and what governance rights does the group have over key decisions, including project financing, budgets and development milestones?

Company's Response to Questions 1(i), (ii), (iii) & (iv)

The Company acknowledges the value that detailed operational metrics provide to shareholders in evaluating performance and inventory exposure. However, as a listed issuer, it is always our responsibility and policy to safeguard the Group's commercial interests and competitive edge. Hence, the Group does not disclose detailed, project-specific operational data, phase-specific take-up rates, or individual unit sales progress in order to continue to safeguard and protect the Group's competitive edge and strategic advantage and most importantly, all of our shareholders' interests and related value creation on ongoing basis.

The Board views localised commercial metrics and micro-level breakdowns as commercially sensitive. Maintaining confidentiality over this information is essential to preserving the Group's strategic pricing flexibility, market positioning, and negotiation leverage with contractors in highly competitive target markets.

The Company will continue to update shareholders on the Group's aggregate performance and broader strategic direction through its regular half-yearly financial results reporting and Annual Reports.

Company's Response to Question 1(v)

As announced by the Company on 11 November 2024, the Group holds a 45% interest in Rivanis Ventures Sdn. Bhd. (**"RVSB"**), a special purpose vehicle incorporated to undertake a mixed development project in Prai, Penang (**"Project"**). The remaining 55% is held by Futuprop Sdn. Bhd., a wholly owned subsidiary of Kerjaya Prospek Group Berhad (**"Kerjaya Prospek"**). The partners' rights and obligations are set out in the Joint Venture Agreement dated 11 November 2024.

Broadly, Kerjaya Prospek will take the lead in the development of the Project and the day-to-day operations of RVSB, while both shareholders are expected to contribute their respective expertise.

Capital contributions are in proportion to shareholding. The Project is expected to be funded mainly through project-level financing from financial institutions.

In terms of governance, the Group is represented on the RVSB board, with three out of seven directors nominated by the Group. Key matters, including business plans, annual budget, borrowings, acquisition and disposal of significant assets are reserved matters that need the approval of both shareholders.

SIAS Question 2

Would the board/management provide shareholders with greater clarity on several financial and operational matters? Specifically:

CONSOLIDATED STATEMENT OF CASH FLOWS
FOR THE FINANCIAL YEAR ENDED 30 JUNE 2026

	Note	Group	
		2026	2025
		RM'000	RM'000
Cash flows from operating activities			
(Loss)/Profit before tax from continuing operations		(13,031)	64,275
Profit before tax from discontinued operations		-	8,113
Total (loss)/profit before tax		(13,031)	72,388
Adjustments for:			
Depreciation of property, plant and equipment	4	4,185	7,422
Fair value gain on investment properties	5	(922)	-
Finance costs	26	8,249	15,131
Finance income	26	(1,547)	(436)
Property, plant and equipment written off	4	102	9
Impairment loss on property, plant and equipment		-	1,058
Impairment loss on receivables	25	195	18,182
Impairment loss on development properties	8	6,700	-
Development cost written off	25	18,492	-
(Gain)/Loss on disposal of property, plant and equipment	4	(43)	130
Gain on deconsolidation of subsidiaries		-	(4,721)
Gain on disposal of joint venture	24	-	(74,081)
Loss/(Gain) on remeasurement of lease liabilities		52	(1,779)
Reversal of impairment loss on property, plant and equipment	4	(1,154)	-

(i) Can management provide a project-by-project breakdown of the impairment losses on development properties and development costs written off during FY2026, including the amount attributable to each project and the underlying reasons for the charges?

Note 5 states that, as at 30 June 2026, the group held investment properties with a carrying value of RM35.2 million. These assets were transferred from property, plant and equipment (PPE) during the year.

(ii) What assets comprise the RM35.2 million investment properties balance transferred from PPE during FY2026? Were these assets reclassified as part of a deliberate change in use, and if so, what was the basis of this decision? In addition, what is the current utilisation and income-generating status?

Terms and debt repayment schedule

Group	Effective Interest rate %	Year of maturity	Currency	2026 Face value RM'000	2026 Carrying amount RM'000	2025 Face value RM'000	2025 Carrying amount RM'000
Revolving credit – secured	8.45 (2025: 8.45)	2026-2027	RM	18,767	18,767	28,204	28,204

(iii) What is the group's target capital structure and financing mix? How does the secured revolving credit facility, with relatively high interest rates of 8.45%, fit within this strategy? Why is management using revolving credit facilities to fund development given that projects have long cash-conversion cycles?

Company's Response to Question 2(i)

The impairment losses and development costs written off relate to undeveloped land parcels held by two subsidiaries of the Group. The charges were recognised following a reassessment of the intended purpose and realisable value of the relevant assets, taking into account prevailing circumstances and the applicable accounting requirements. The assessment was undertaken as part of the Group's financial reporting process.

Company's Response to Question 2(ii)

The assets reclassified comprise several buildings and the attached parcels of land owned by the Group, including the Vervea Trade and Exhibition Centre ("**VTEC**"), which were leased to third parties during the financial year and generated rental income. Accordingly, the commencement of third-party leasing provided an objective and appropriate basis for their reclassification from property, plant and equipment to investment properties in accordance with the applicable accounting standards. Rental income from these properties specifically contributes RM0.7mil during the current financial year.

Company's Response to Question 2(iii)

The Group seeks to maintain a prudent and flexible capital structure, with an appropriate mix of internal funds, project-related borrowings and other banking facilities, taking into account its development pipeline, cash-flow requirements and prevailing market conditions. The short-term secured revolving credit facility is not utilised to fund development projects, and the interest rate charged is considered commercially reasonable for a facility of this nature. It forms part of the Group's overall liquidity management framework and provides flexibility to meet short-term funding requirements as and when they arise.

The Group regularly reviews its financing mix and will consider refinancing or alternative funding options where commercially appropriate, with the objective of managing financing costs, liquidity and maturity risks prudently.

SIAS Question 3

The company was listed on the Catalist board in 2017 and transferred to the SGX mainboard in 2021.



(i) What has been the company's total shareholder return since its transfer to the SGX mainboard in 2021 and since its listing in 2017?

In the sustainability report, the company states that "[the group] *recognises the crucial role of economic sustainability in balancing growth, financial performance and responsible business practices*".

	*FY2024 (RM'000)	FY2025 (RM'000)	FY2026 (RM'000)
Economic value generated:			
Total revenue	**233,378**	**246,906**	**201,182**
Economic value distributed:			
Compensation and benefits for employees	13,184	14,296	16,528
Operating costs	241,269	242,015	204,018
Payments to provider of capital (dividend)	-	-	-
Payments to the government including taxes	13,746	9,266	10,826
Community investments	284	291	449
	268,483	**265,868**	**231,821**

However, over the past three financial years, total economic value distributed has exceeded economic value generated. In two of those years, operating costs alone exceeded revenue. The economic value distributed to providers of capital was also nil throughout this period.

(ii) How does the board reconcile these figures with the company's stated commitment to economic sustainability, particularly when operating costs have exceeded revenue in two of the three years and providers of capital have received no economic value? What guidance has the board given to management on providing

returns to capital providers in the form of dividends?

(iii) How have the independent directors assessed management's performance over the past decade, particularly in light of the group's financial and shareholder return record?

(iv) Separately, rather than relying solely on the president and CEO's message to shareholders, will the independent chairman provide a regular statement to shareholders in the annual report, setting out his assessment of the company's performance and prospects, challenges, board effectiveness and key governance priorities?

Company's Response to Question 3(i)

Date	Listing Board	Listing price	As of 15 Oct 2026	Shareholder returns
		SG$	SG$	%
Jul-17	Catalist board	0.23	0.02	-91%
Jan-21	Mainboard	0.27	0.02	-93%

Company's Response to Question 3(ii)

	*FY2024 (RM'000)	FY2025 (RM'000)	FY2026 (RM'000)
Economic value generated:			
Total revenue	233,378	246,906	201,182
Economic value distributed:			
Operating costs	241,269	242,015	204,018
(-) Non-recurring items	(40,000)	(18,182)	(25,387)
Operating costs (excluding non-recurring items)	201,269	223,833	178,631

The Board notes that operating costs over the three-year period were significantly affected by exceptional and non-recurring items, including a RM40.0 million provision for litigation settlement in FY2024, an RM18.2 million impairment of receivables in FY2025, and RM25.4 million impairment losses on development properties, receivables and development cost written off in FY2026. These accounting adjustments materially increased reported operating costs and are not reflective of the Group's underlying operating performance. The Group's operating costs, excluding the non-recurring items above, are still relatively below the economic inflow of the Group.

The Board assesses economic sustainability based on the Group's operating cash flows, financial position, project execution and long-term value creation. Given the Group's ongoing funding requirements and commitment to maintaining a strong balance sheet, no dividends were declared during the period.

The Board will provide close and clear guidance to management to drive progressive growth to the Group in order to generate operating cash flows to provide decent returns to capital providers in the form of dividends. Accordingly, the Board will continue to review its dividend policy when the Group's financial performance and cash flow position improve and permit any dividend payment in future.

Company's Response to Question 3(iii)

The Board, including the independent directors, oversees and assesses management's performance through its quarterly review of the Group's financial and operational performance, as well as its review of execution of business strategies, risk management and progress towards its business objectives alongside the broader operating environment and the Group's long-term business strategies.

In assessing management's performance, the Board considers the Group's financial results and shareholder returns alongside the broader operating environment, significant non-recurring items and the Group's long-term business prospects. The Board recognises the importance of improving financial performance and enhancing shareholder value and continues to guide management towards strengthening the Group's financial position and achieving sustainable long-term growth.

Company's Response to Question 3(iv)

The Board notes SIAS's suggestion for the Independent Chairman to provide a regular statement to shareholders in the Annual Report. The Company will consider this suggestion as part of its ongoing review of its corporate reporting practices, with a view to enhancing transparency on the Board's assessment of the Group's performance and prospects.

BY ORDER OF THE BOARD
Aspen (Group) Holdings Limited

Dato' Murly Manokharan
President and Group Chief Executive Officer
28 October 2026