



TREK 2000 INTERNATIONAL LTD

(Co. Reg. No.: 199905744N)

RESPONSE TO QUERIES FROM SINGAPORE EXCHANGE SECURITIES TRADING LIMITED ON ANNUAL REPORT 2014

The Board of Directors of Trek 2000 International Ltd ("Trek" or "the Company") refers to SGX's email dated 23 April 2015 seeking clarification in respect of the Annual Report 2014. Our responses to SGX's queries are as follows:

SGX's Question (1) : We note that the board did not provide opinion with the concurrence of the audit committee on the adequacy of the internal controls, addressing financial, operational and compliance risks. Please make disclosures as required by Rule 1207(10) of the Listing Manual.

The Company's Response : Please refer to paragraph 7 at page 32 of the Report of Corporate Governance which states that the Board, with the concurrence of the AC, is satisfied that there are adequate internal controls in the Group, including financial, operational, and compliance and information technology controls, and risk management systems.

SGX's Question (2) : We note that the board had not commented on the adequacy and effectiveness of the internal controls, including financial, operational, compliance, information technology controls and risk management systems. Please make disclosures as recommended in Guideline 11.3 of the code of Corporate Governance 2012 (the "Code").

The Company's Response : Please refer to paragraphs 1 and 2 at page 31 of the Report of Corporate Governance which states that the Board, with the concurrence of the AC and RRC, is satisfied that in the absence of any evidence to the contrary, the systems of internal controls, including financial, operational, and compliance and information technology controls, and risk management maintained by the Company's management that was in place throughout the financial year and up to the date of this report, provides reasonable, but not absolute assurance against material financial misstatements or loss, and include the safeguarding of assets, the maintenance of proper accounting records, the reliability of financial information, compliance with appropriate legislation, regulations, and best practice, and the identification and containment of business risk. The Board notes that no system of internal control could provide absolute assurance against the occurrence of material errors, poor judgment in decision-making, human error, losses, fraud or other irregularities.

The Board also receives assurance from CEO and Chief Financial Controller that the financial records have been properly maintained and the financial statements give a true and fair view of the company's operations and finances; and regarding the effectiveness of the Company's risk management and internal control systems.

SGX's Question (3) : As required by Rule 1207(12) of the Listing Manual, please make disclosures as recommended in paragraph 9.4 of the Code of Corporate Governance 2012 (the "Code") or otherwise explain the reason(s) for the deviation from the following Code recommendations. We note that the Company had not provided the reason for not disclosing the remuneration of employees who are immediate family members of a director or the CEO and whose remuneration exceeds S\$50,000 during the year and disclosed the remuneration in incremental bands of S\$50,000 with an upper limit. Please explain the deviation from the recommendation.

The Company's Response : Please refer to paragraph 1 at page 30 of the Report of Corporate Governance which states that There are no employees who are immediate family of director whose remuneration exceeds S\$50,000 during the year, except for Mr. Tan Boon Tat and Mr. Tan Boon Siong, brothers of Mr. Henn Tan, CEO and Chairman of the Company, and Mr. Tan Joon Yong Wayne, son of Mr. Henn Tan, whose remuneration exceeded S\$50,000 during the financial year ended 31 December 2014.

Submitted by Gurcharan Singh, Executive Director on 24/04/2015 to the SGX.