



SUNRIGHT LIMITED

(Co. Reg. No.: 197800523M)

1093 Lower Delta Road, #02-01/08

Tiong Bahru Industrial Estate

Singapore 169204

Tel: (65) 62725842 Fax: (65) 62768426

REPLIES TO QUERIES FROM SINGAPORE EXCHANGE SECURITIES TRADING LIMITED (“SGX-ST”) IN RELATION TO THE COMPANY’S ANNUAL REPORT 2015

Further to the Company’s release of its Annual Report 2015 on 29 October 2015, the Board of Directors (“the Board”) of Sunright Limited (“the Company”) wishes to provide the information in response to the questions raised by SGX on 13 November 2015.

SGX-ST’s Query No. 1

Rule 1207(4)(b)(iii) of the Listing Manual requires disclosure on the background of key management staff. However, there is no disclosure on the details of the key management staff. Please provide information read under Rule 1207(4)(b)(iii) of the Listing Manual.

Company’s Response

The Board wishes to clarify that the Executive Directors (being Mr Samuel Lim Syn Soo and Mr Kenneth Tan Teoh Khoon) are the key management staff and their details were disclosed on page 5 of the annual report.

In addition, it was disclosed on page 10 of the annual report that “the Board has delegated the day-to-day management and running of the Company to the Management headed by the Chief Executive Officer, Mr Samuel Lim Syn Soo, and the Executive Director, Mr Kenneth Tan Teoh Khoon. The Executive Directors supervise the management of the Group’s operations.”

SGX-ST’s Query No. 2

Pursuant to Guideline 9.3 of the Code of Corporate Governance 2012 (the “Code”), the aggregate remuneration paid to the top five key management personnel (who are not directors or the CEO) should be disclosed. Please make disclosures as recommended in Guideline 9.3 of the Code or otherwise explain the reason(s) for the deviation from the following Code recommendations.

Company’s Response

The Board refers to the disclosure made on page 18 of the annual report whereby the Company had explained that it refrains from disclosing the details of the remuneration of its top five (5) executives as it believes that doing so is not in its best interests due to the sensitive and confidential nature of such information.

Furthermore, as mentioned in the Company’s Response to SGX-ST’s Query No. 1 above, the Company has only two (2) key management staff, being its Executive Directors.



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SGX-ST's Query No. 3

Please clarify why the audit fees and non-audit fees paid to other auditors is higher than that to the auditors of the Company.

Company's Response

The audit fees and non-audit fees paid to other auditors were higher than that to the auditors of the Company, as they relate to fees incurred by overseas subsidiaries, including KESM Industries Berhad and its subsidiaries, following the adoption and application of FRS110 *Consolidated Financial Statements*.

By Order of the Board
Adeline Lim Kim Swan
Company Secretary

17 November 2015