



HEETON HOLDINGS LIMITED

(Incorporated in the Republic of Singapore)
(Company Registration Number: 197601387M)

RESPONSE TO QUERIES FROM SINGAPORE EXCHANGE SECURITIES TRADING LIMITED ON THE ANNUAL REPORT 2013

In response to the queries raised by the Singapore Exchange Securities Trading Limited on 25 April 2014, the board of Directors (the “**Board**”) of Heeton Holdings Limited (the “**Company**”) wishes to provide the following information:

Query no. 1

As required by Rule 1207(12) of the Listing Manual, please make disclosures as recommended in paragraph 9.3 of the Code of Corporate Governance 2012 (the “Code”) or otherwise explain the reason(s) for the deviation from the following Code recommendations. Paragraph 9.3 of the Code states that the Company should disclose in aggregate the total remuneration paid to the top five key management personnel (who are not directors or the CEO).

Our Response:

The Group currently only has two key management executives. Details on the remuneration of the key management executives of the Group for the financial year ended 31 December 2013 has been disclosed accordingly on page 29 of our Annual Report.

For confidential reasons, the Board has not disclosed the total remuneration paid to each key management executive of the Company.

Query no. 2

Paragraph 11.3 of the Code states that the Board should comment on the adequacy and effectiveness of the internal controls, including financial, operational, compliance and information technology controls, and risk management systems, in the company’s Annual Report. As recommended in paragraph 11.3 of the Code and pursuant to Rule 710 of the Listing Manual, please make disclosures on the Board’s comments on the adequacy and effectiveness of the Company’s information technology controls and risk management systems or otherwise explain the reason(s) for the deviation from the following Code recommendations.

Our Response:

Based on the internal controls established and maintained by the Group, work performed by the outsourced internal auditors and external auditors, and reviews performed by management, the Board is of the opinion that the Group’s internal controls, addressing financial, operational, compliance and information technology controls and risk management systems were adequate and effective as at 31 December 2013.

By order of the Board

Low Yee Khim
Executive Director
28 April 2014