

RESPONSE TO SGX QUERY: ANNUAL REPORT FY2019

ST Engineering Technologies Ltd (“ST Engineering” or the “Company”) sets out below its response to the query raised by the Singapore Exchange Regulation on 8 May 2020 in relation to its disclosure on dealings in securities in the Annual Report 2019.

SGX Query

Rule 1207(19) provides that the annual report must contain a statement whether and how the issuer has complied with the following best practices on dealings in securities:-

- (a) A listed issuer should devise and adopt its own internal compliance code to provide guidance to its officers with regard to dealing by the listed issuer and its officer in its securities;
- (b) An officer should not deal in his company’s securities on short-term considerations; and
- (c) A listed issuer and its officers should not deal in the listed issuer’s securities during the period commencing two weeks before the announcement of the company financial statements for each of the first three quarters of its financial year and one month before the announcement of the company’s full year financial statements (if the issuer announces its quarterly financial statements, whether required by the Exchange or otherwise) or one month before the announcement of the company’s half year and full year financial statements (if the issuer does not announce its quarterly financial statements).

Company’s Response

This announcement is made to supplement the Company’s disclosure in its Annual Report 2019. ST Engineering has been in compliance with the above best practices on dealings by the listed issuer and its officer in its securities as set out in the SGX Listing Rules 1207(19) in the following manner:-

- (i) The Company has an internal code of business conduct and ethics guiding all employees with regard to dealing in securities of ST Engineering.
- (ii) At least 3 weeks before our quarterly financial results, the Company Secretary will send out reminders to Directors and Officers of ST Engineering on the prohibition of trading in ST Engineering’s securities commencing two weeks before the announcement of the financial statement for each of the first three quarters and full year financial statement as well as advising them not to trade ST Engineering’s securities on short-term considerations.

Following the amendments to the quarterly reporting framework, the Company has adopted half-year and full-year financial statement announcements instead of quarterly financial announcement. The Company and the officers will observe a one month trading black out period commencing one month before the announcement of the Company's half-year and full-year financial statements hence forth. The Company will have a clearer statement to reflect the Company's practices on dealings its securities in its next year's Annual Report.

By Order of the Board

Tan Wan Hoon
Joint Company Secretary

Singapore, 11 May 2020

ST Engineering is a global technology, defence and engineering group specialising in the aerospace, electronics, land systems and marine sectors. The Group employs about 23,000 people across offices in Asia, Europe, Middle East and the U.S., serving customers in the defence, government and commercial segments in more than 100 countries. With more than 700 smart city projects across 130 cities in its track record, the Group continues to help transform cities through its suite of Smart Mobility, Smart Security and Smart Environment solutions. Headquartered in Singapore, ST Engineering reported revenue of \$7.9b in FY2019 and it ranks among the largest companies listed on the Singapore Exchange. It is a component stock of the FTSE Straits Times Index, MSCI Singapore, iEdge SG ESG Transparency Index and iEdge SG ESG Leaders Index. For more information, please visit www.stengg.com.

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