SILVERLAKE AXIS LTD

(Incorporated in Bermuda)
(Company Registration No. 32447)

RESPONSE TO SGX QUERIES ON ANNUAL REPORT FY2014

In response to the queries raised by SGX in its email dated 20 October 2014 on the Annual Report of Silverlake Axis Ltd. (the "Company" and together with its subsidiaries, the "Group") for the year ended 30 June 2014 ("FY2014"), the Company would like to clarify on the following:

Query 1: Paragraph 9.2 of the Code states that the Company should fully disclose the remuneration of each individual director and the CEO on a named basis. For administrative convenience, the Company may round off the disclosed figures to the nearest thousand dollars. There should be a breakdown (in percentage or dollar terms) of each director's and the CEO's remuneration earned through base/fixed salary, variable or performance-related income/bonuses, benefits in kind, stock options granted, share-based incentives and awards, and other long-term incentives.

As the Company did not fully disclose the remuneration of each individual director and the CEO as required under Listing Rule 1207(12), please make the disclosure as recommended in the Code or otherwise explain any deviation from the recommendation.

Response: Due to competitive reasons and confidentiality and sensitivity of remuneration matters, the Company has only disclosed the remuneration mix and remuneration band of each individual director on a named basis and the annual aggregate remuneration paid to all directors in Page 30 of the Annual Report.

The Board of Directors is of the view that the information disclosed in the Annual Report would be sufficient for shareholders to have an adequate understanding of the Company's remuneration policies and practice. The Board of Directors believes that full disclosure of remuneration of each individual director on a named basis would be disadvantageous to the Group's business interests, given the highly competitive industry conditions.

Query 2: On page 33, it is stated that fees paid for non-audit services provided by the external auditors of the Company amounted to RM347,966 while the aggregate amount of fees paid to the external auditors amounted to RM871,779. Given that fees paid for non-audit fees represents approximately 40% of aggregate amount of fees paid to external auditors, please set out the basis for the AC's opinion that the AC is satisfied with the independence and objectivity of the external auditors.

Response: The non-audit fees paid to external auditors comprise engagements relating to the acquisitions of Merimen Group and Cyber Village, and statutory tax compliance and advisory services. The Audit Committee is of the view that the non-audit services do not affect the independence and objectivity of the external auditors because the non-audit services were performed by separate engagement teams.

BY ORDER OF THE BOARD

Kwong Yong Sin
Group Managing Director

21 October 2014