

Ref: REG/LC/CLSQ/2015080034-R1

18 September 2015

Rodyk & Davidson LLP
80 Raffles Place
#33-00 UOB Plaza I
Singapore 048624

PRIVATE AND CONFIDENTIAL

Attn: Ms. Valerie Ong / Mr. Au Yong Hung Mun

Dear Sirs

HEETON HOLDINGS LIMITED ("HEETON" OR THE "COMPANY")

APPLICATION FOR THE LISTING AND QUOTATION OF UP TO 89,538,398 NEW ORDINARY SHARES ("RIGHTS SHARES") IN THE CAPITAL OF THE COMPANY AT AN ISSUE PRICE OF S\$0.493 PER RIGHTS SHARE PURSUANT TO A RENOUNCEABLE NON-UNDERWRITTEN RIGHTS ISSUE ON THE BASIS OF ONE (1) RIGHTS SHARE FOR EVERY THREE (3) EXISTING SHARES HELD IN THE CAPITAL OF THE COMPANY ("RIGHTS ISSUE").

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1. We refer to your letter dated 18 August 2015 on the above.
 2. We wish to advise that the Exchange has approved in-principle the above application subject to the following:-
 - (a) Compliance with the Exchange's listing requirements;
 - (b) A written undertaking from the Company that it will comply with Listing Rules 704(30), 815 and 1207(20) in relation to the use of the proceeds from the Rights Issue and where proceeds are to be used for working capital purposes, the Company will disclose a breakdown with specific details on the use of proceeds for working capital in the Company's announcements on use of proceeds and in the annual report;
 - (c) A written undertaking from the Company that it will comply with the confirmation given in Listing Rule 877(10) with regards to the allotment of any excess Rights Shares; and
 - (d) A written confirmation from financial institution(s) as required under Listing Rule 877(9) that the substantial shareholders who have given the irrevocable undertakings have sufficient financial resources to fulfil their obligations under its undertakings.



3. Please note that the Exchange's in-principle approval is not to be taken as an indication of the merits of the Rights Issue, Rights Shares, the Company and/or its subsidiaries. Kindly include this statement in all of the Company's announcements which make reference to the Exchange's in-principle approval for the listing and quotation of the Rights Shares.
4. Please note the Company's obligations under Listing Rule 864(4) to notify the Exchange immediately upon any significant changes affecting any matter contained in the application, or which would be required to be included in the application if it had arisen before the application was submitted.
5. Please also furnish Issuer Services with a copy of the time-table for the Rights Issue. The contact person is Ms Darrell Lam (DID: 6236 8893 and Fax: 6536 7568).
6. For listing of the Rights Shares, please submit the following documents to Issuer Services:-
 - (a) A written confirmation as to whether the Right Shares to be issued rank *pari passu* in all respects with the existing shares of the Company. If the share certificates are endorsed, please advise Issuer Services of the endorsement;
 - (b) A written confirmation that all share certificates have been issued and despatched to entitled shareholders and The Central Depository (Pte) Ltd; and
 - (c) A copy of the Return of Allotment duly filed with the Accounting & Corporate Regulatory Authority (if applicable).
7. A copy of your cover letter accompanying the required documents should also be sent simultaneously to Listings, Markets Group. Payment of the listing fees for the Rights Shares is to be made through telegraphic transfer to "Singapore Exchange Securities Trading Limited". The name of the Company should be indicated when making the transfer. Please contact Ms Tiffany Siow at 6236 5106 should you require advice on the payment.

Yours faithfully

A handwritten signature in blue ink, appearing to read "Eliza Tan", is written over a light blue horizontal line.

Eliza Tan
Vice President
Listing Compliance

cc. Ms Darrell Lam, Issuer Services, Operations Group
Ms Tiffany Siow, Listings