VIBRANT GROUP LIMITED
Company Registration Number: 198600061G

RESPONSE TO SGX-ST QUERY ON ANNUAL REPORT 2016

The Board of Directors of Vibrant Group Limited (the "Company") refers to the queries raised by the Singapore Exchange Securities Trading Limited ("SGX-ST") on 29 August 2016 regarding the disclosure of information in the Corporate Governance Report in the Company's 2016 Annual Report. The Company sets out its response as follows:

SGX-ST's Query 1:

Guideline 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.

The Board should also comment in the company's Annual Report on whether it has received assurance from the CEO and the CFO:
(a) that the financial records have been properly maintained and the financial statements give a true and fair view of the company's operations and finances; and
(b) regarding the effectiveness of the company's risk management and internal control systems.

It was disclosed on page 35 the Board's comment on the adequacy of internal controls, including financial, operational and compliance risk. It was also disclosed that the Board has received assurance from CEO and Chief Financial Officer that the financial records have been properly maintained and the financial statements give a true and fair view of the company's operation and finances.

In this regard, please disclose (i) the Board's comment on adequacy of internal controls regarding information technology and risk management system, (ii) the Board's comment on the effectiveness of internal controls, including financial, operational, compliance and information technology controls, and risk management systems, and (iii) whether the Board has received assurance from the CEO and Chief Financial Officer regarding the effectiveness of the company's risk management and internal control systems, as recommended by the Code; or otherwise provide an explanation for the deviation from the Code pursuant to Listing Rule 710.

Company's Response to SGX Query 1

Based on the internal controls established and maintained by the Group, work performed by the internal and external auditors, and reviews performed by management and various Board Committees, the Board is satisfied that adequate internal controls have been maintained on information technology and risk management system, and internal controls, including financial, operational, compliance and information technology controls, and risk management systems are effective.

The Board has also received assurance from the CEO and Chief Financial Officer regarding the effectiveness of the company's risk management and internal control systems.

SGX-ST's Query 2:

Guideline 9.3(4) of the Code recommends that the Company disclose the aggregate remuneration paid to the top five key management personnel (who are not directors or the CEO).

Please disclose the aggregate remuneration paid to the top five key management personnel (who are not directors or the CEO) as recommended by the Code; or otherwise provide an explanation for the deviation from the Code pursuant to Listing Rule 710.

Company's Response to SGX Query 2

Having considered the sensitivity and confidentiality of remuneration matters and given that the Group operates in a highly competitive industry, the Company believes that it is not in the best interest of the Company to disclose the aggregate remuneration paid to the top five key management personnel (who are not directors or the CEO).

By Order of the Board
Vibrant Group Limited

Eric Khua
Executive Director & CEO
29 August 2016