PAVILLON HOLDINGS LTD.

(Company Registration No. 199905141N) (Incorporated in Singapore)

CLARIFICATION ON THE ANNUAL REPORT 2015

The Board of Directors (the "**Board**") of Pavillon Holdings Ltd. (the "**Company**") refers to the query raised by the Singapore Exchange Securities Trading Limited ("SGX-ST") in its email of 25 April 2016 relating to the Company's Annual Report 2015.

The Board wishes to provide clarification as follows:-

SGX-ST's Query:

Guideline 9.3 of the Code of Corporate Governance (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). As required by Rule 1207(12) of the Listing Manual, please make disclosures as recommended in paragraph 9.3 of the Code or otherwise explain the reason(s) for the deviation from the following Code recommendations.

Company's Response:

It was disclosed on page 87 of the Annual Report 2015 that the Company decided not to disclose information on the remuneration of the top five (5) key management personnel in dollars terms because of its confidentiality and the Company's concern over poaching of these key management personnel by competitors.

For the same reasons above, the Company believes it is not in the interests of the Company to disclose the total aggregate remuneration paid to the top five (5) key management personnel (who are not directors or the CEO).

By Order of the Board

Dr John Chen Seow Phun Executive Chairman

Date: 26 April 2016