SAMUDERA SHIPPING LINE LTD
(Company Registration No.: 199308462C)
(Incorporated in Singapore)

RESPONSE TO QUERIES FROM SINGAPORE EXCHANGE SECURITIES TRADING LIMITED ON THE COMPANY'S FY2019 ANNUAL REPORT

The Board of Directors (the "**Board**") of Samudera Shipping Line Ltd (the "**Company**", and together with its subsidiaries, the "**Group**") wishes to respond to the following queries raised by the Singapore Exchange Securities Trading Limited ("**SGX-ST**") in its email dated 21 April 2020 on the Company's Annual Report for the financial year ended 31 December 2019 ("**FY2019**").

Query:

(a) Provision 2.2 of the Code of Corporate Governance (the "Code") provides that independent directors should make up a majority of the Board where the Chairman is not independent.

Pursuant to Rule 710 of the Listing Manual, where there are variations from the Provisions, the issuer must provide the provision from which it has varied, explain the reason for variation, and explain how the practices it had adopted are consistent with the intent of the relevant principle.

In this regard, please clarify how the Company has complied with Provision 2.2 of the Code.

Respond:

The Company's current Board composition comprises five (5) Independent Non-Executive Directors, four (4) Executive Directors and one (1) Non-Independent Non-Executive Director. Since majority of the Board members are Non-Executive Directors and at least half the Board is made up of Independent Non-Executive Directors, the Board is of the view that it has an appropriate level of independence and is able to make decisions in the best interest of the Company. No individual or small group of individuals dominate the Board's decision making process and there is no undue influence by Management over the Board.

Nevertheless, the Board is cognizant of the recommendations as set out under Provision 2.2 of the Code and together with the NC will continue to review and recommend appropriate changes to the Board composition in order to comply with Provision 2.2 of the Code before 1 January 2022.

Query:

(b) Provision 8.1 provides, *inter alia*, that the Company discloses in its annual report, the names, amounts and breakdown of remuneration of each individual director and the CEO.

In this regard, please clarify how the Company has complied with Provision 8.1 of the Code and in particular, disclosure of the amount of remuneration of each individual director and the CEO.

Respond:

Reference is made to page 18 of the Company's FY2019 Annual Report (Financial Report). The RC and the Board, having considered Management's rationale, had collectively concurred that a Group-wide cross section of the Directors' remuneration and their names in bands of S$250,000 provides sufficient overview and disclosure of their remuneration. The RC and the Board deem remuneration to be a highly sensitive and confidential matter and especially so for remuneration matters in a highly competitive human resource environment.

It would not be in the best interest of the Company to disclose the remuneration amounts of the CEO and each individual director.

BY ORDER OF THE BOARD

Hermawan Fridiana Herman
Executive Director, Finance
23 April 2020