LIFEBRANDZ LTD

(INCORPORATED IN THE REPUBLIC OF SINGAPORE) (COMPANY REGISTRATION NUMBER: 200311348E)

RESPONSE TO SGX QUERY ON ANNUAL REPORT 2015

Response to SGX's email dated 11 November 2015 on Company's announcement on 5 November 2015 in relation to the Annual Report for the year ended 31 July 2015.

SGX's Query:

- 1) Paragraph 9.3 of 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 of Corporate Governance 2012 (the "Code") or otherwise explain the reason(s) for the deviation from the following Code recommendations.
- 2) We note on page 20 of the Company's Annual Report that the Company has disclosed the remuneration of its top two (2) key executives (who are also not directors) in bands of \$\$250,000. Guideline 9.1 of the Code of Corporate Governance states that the company should report at least the top five key management personnel (who are also not directors or the CEO) of the company. In this respect, please explain why the Company has disclosed only the remuneration of its top two (2) key executives.

Company's Response:

- 1) During the financial year under review, the Company had only two key management personnel (who are not directors or the CEO). In view of the confidential nature and sensitivity of key management personnel on the disclosure requirement under Guideline 9.3, the Company believes the disclosure in aggregate the total remuneration paid to the key management personnel would be disadvantageous to the Group's interests, and has opted to disclose the remuneration of key management personnel in bands of \$\$250,000.
- 2) There were only two key management personnel (who are not directors or the CEO) in the financial year under review whom the Company considered as key management personnel. The names and remuneration in band of \$\$250,000 of these two key management personnel had been duly disclosed on page 20 of the Company's Annual Report.

By Order of the Board

Chng Weng Wah
CEO / Executive Director

Dated: 12 November 2015