

**BROMAT HOLDINGS LTD.**  
(Company Registration No. 201715253N)  
(Incorporated in Singapore)

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**RESPONSES TO SGX QUERIES**

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The Board of Directors (the “**Board**”) of Bromat Holdings Ltd. (the “**Company**”, and together with its subsidiaries, the “**Group**”) refers to the Company’s announcement dated 21 October 2025 in relation to the receipt of a summon by a Director of the Company (the “**Earlier Announcement**”) and has received the following queries from the Singapore Exchange Securities Trading Limited (“**SGX-ST**”) and wishes to provide its responses below.

In addition, the Company has on 24 October 2025 released another announcement in relation to the receipt of a summon by Mr Tan for the same charges but for different subsidiary, namely NSB Hotpot Pte Ltd. The Board wishes to highlight that its responses below shall also apply to the second summon received for NSB Hotpot Pte Ltd.

*Capitalised terms used herein shall, unless otherwise defined, have the same meanings ascribed to them in the Earlier Announcement.*

**SGX-ST queries:**

(i) We refer to the following:

“NSBR has failed to furnish the Comptroller with the stipulated accounts of NSBR and any available computation of the income tax payable of NSBR on time in respect of the year of assessment 2024 (the “**Delay**”), thereby committed an offence under section 65(1)(a) of the ITA and punishable under section 65C(2) of the same. The Delay arose as the Company was engaged in discussions with its auditor on payment matters for the Group.”

- a. When did Mr Tan receive the Charge? Following his receipt of the Charge, what were the action steps taken by Mr Tan, the Board and the NC?

**Company’s response:**

Mr Tan received the letter in relation to the Charge from the Inland Revenue Authority of Singapore (“**IRAS**”), which has been posted to his residence in the late evening of 15 October 2025, and he notified the Board via email on 16 October 2025. The Board subsequently asked the Company to update its sponsor, SAC Capital Private Limited.

Mr Tan instructed the Company’s accountant to make immediate payment for the composition fine of \$1,000 on 16 October 2025 to IRAS and the payment was made on the same morning, together with the request to extend the deadline for submission of the financial statements of NSBR until 31 December 2025.

On 17 October 2025, the Company informed its auditors via email of the receipt of the Charge and requested that they expedite the finalisation and sign-off of the financial statements of NSBR to facilitate submission on 3 November 2025.

b. Please address Mr Tan's involvement in the above, and provide details to explain whether and how he is directly or indirectly implicated in the offence committed by NSBR.

**Company's response:**

Mr Tan, being the sole director of NSBR, hence is implicated in the offence committed.

c. Please explain how "discussions with its auditor on payment matters for the Group" led to the Delay.

**Company's response:**

The Delay arose due to outstanding payment relating to audit fees and the assessment of the going concern issue, which requires the certainty of sufficient cashflow to meet NSBR's working capital requirements. This assessment is crucial for the completion of the audit as the financial statements have been prepared on a going concern basis.

(ii) We refer to the following: "The Charge does not affect the financials, business and operations of the Group."

Please provide the Board and Audit Committee's assessment to explain why the "Charge does not affect the financials, business and operations of the Group".

**Company's response:**

The Board and Audit Committee wish to emphasise that the Charge arose from failure by NSBR to furnish the Comptroller with the stipulated accounts of NSBR and any available computation of the income tax payable of NSBR on time in respect of the year of assessment 2024. It does not directly involve the liability of the Company or the Group (other than the composition sum) and does not affect business and operations of the Company and the Group.

(iii) We refer to the following: "The Comptroller is prepared to compound this offence if NSBR's required documents are submitted and payment of a composition sum of \$1,000 by 3 November 2025. The Composition sum of \$1,000 has been paid and NSBR has written to the Comptroller to request an extension of time to file the documents by 31 December 2025."

- a. Why is NSBR unable to furnish the Comptroller with the required documents by 3 November 2025?
- b. In the event that the request for an extension of time is rejected, what will be the impact or implications on the Company and/or the Group?

**Company's response:**

The extension of time will allow NSBR and its auditors additional time to complete the audit and submit the required documents to the Comptroller.

NSBR has been informed by IRAS that if it needs more time to file the outstanding returns, it may appeal for an adjournment, which will be subject to the Judge's approval at the hearing scheduled on 6 November 2025. In the meantime, NSBR has requested its auditor to expedite the audit to meet the submission timeline.

The Company will provide further updates on this matter as and when there are material developments.

(iv) We refer to the following: "The NC, after reviewing the facts pertaining to the Charge and making the necessary enquiries regarding the Delay, is of the view that Mr Tan can and should continue in his current position as Acting Chief Executive Officer and Executive Director of the Company. This is because the Charge and the Delay did not arise due to any lack of personal integrity or diligence on his part but are due to circumstances beyond his control."

Please provide the NC's assessment and the bases, including the factors and circumstances it has considered. Please clarify how did the NC reach the conclusion that the Charge and Delay were "due to circumstances beyond his control"?

**Company's response:**

The Company has already taken the necessary steps to complete the IRAS filing based on available documents, including submission of the relevant unaudited financial statements and tax computation based on the relevant unaudited financial statements, prior to the receipt of the Charge. However, the completion of the audit is dependent on the receipt of funding for NBSR to settle the outstanding audit fees and for the assessment of going concern issue as disclosed in the above Query (i)(c) (which is a matter beyond Mr Tan's control). Save for the Charge as disclosed above, and to the best of Mr Tan's knowledge, there are no other conditions or restrictions imposed by the IRAS on him. Mr Tan has confirmed to the Board that the Charge does not affect his ability to devote sufficient time and attention to the affairs of the Company or to discharge his duties as the Acting Chief Executive Officer and Executive Director of the Company.

**By Order of the Board**

Tan Keng Tiong  
Executive Director  
27 October 2025

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*This announcement has been reviewed by the Company's Sponsor, SAC Capital Private Limited (the "Sponsor"). This announcement has not been examined or approved by the Singapore Exchange Securities Trading Limited ("SGX-ST") and the SGX-ST assumes no responsibility for the contents of this announcement, including the correctness of any of the statements or opinions made, or reports contained in this announcement.*

*The contact person for the Sponsor is Ms. Tay Sim Yee (Tel: (65) 6232 3210) at 1 Robinson Road, #21-01 AIA Tower, Singapore 048542.*