



ENVICTUS INTERNATIONAL HOLDINGS LIMITED
(Company Registration No: 200313131Z)

RESPONSES TO SGX QUERIES ON THE COMPANY'S ANNUAL REPORT FOR THE FINANCIAL YEAR 30 SEPTEMBER 2024

Envictus International Holdings Limited (the “**Company**”) and its Board of Directors (the “**Board**”) set out its responses to the queries raised by the Singapore Exchange Securities Trading Limited (“SGX-ST”) on 4 February 2025 in relation to the Company’s Annual Report for the financial year ended 30 September 2024 as follows:-

Query 1

Listing Rule 1207(6)(a) requires that the annual report must state the aggregate amount of fees paid to auditors, which must be broken down into audit and non-audit services. If there are no audit or non-audit fees paid, an appropriate negative statement must be made.

It is noted on page 55 that the “AC has undertaken a review of all non-audit services provided by the external auditors and is of the opinion that the provision of such services would not affect the independence of the auditors”. In this regard, please confirm whether there were any non-audit services provided by the external auditors for the financial year ended 30 September 2024. If so, please disclose the amount of fees paid for such non-audit services.

Company’s response to Query 1

For the financial year ended 30 September 2024, the Group paid a total amount of RM35,000 as non-audit services fees for the Group’s corporate income tax compliance services to BDO Tax Advisory Pte Ltd and BDO Tax Services Sdn Bhd, both of which are network member firms of the external auditors, BDO LLP.

Query 2

Listing Rule 1207(10) requires that the annual report must include a statement by the Board on the “adequacy and effectiveness of the issuer’s internal controls (including financial, operational, compliance and information technology controls) and risk management systems”. It is stated on page 54 of the annual report that, “the Board, with the concurrence of the AC is of the opinion that the Group’s risk management and internal controls systems addressing financial, operational, compliance and information technology risks were adequate as at 30 September 2024”.

Please disclose whether the Board, with the concurrence of the AC, is of the opinion that the Group’s risk management and internal control systems addressing financial, operational, compliance and information technology risks, are both adequate and effective as at 30 September 2024.

Company's response to Query 2

The Board, with the concurrence of the AC is of the opinion that the Group's risk management and internal controls systems addressing financial, operational, compliance and information technology risks, were both adequate and effective as at 30 September 2024.

Query 3

Listing Rule 1207(10C) requires the Audit Committee's comments on whether the internal audit function is independent, effective and adequately resourced. It is noted that the internal audit function has been outsourced to "Smart Focus". In this regard, please provide information on the relevant experience of "Smart Focus" and the engagement team.

Company's response to Query 3

Smart Focus is one of Malaysia's leading management consulting firms, specialised in Internal Audit, Risk Management and Corporate Governance, Sustainability etc. It has been in the business for 25 years since year 2000 servicing large public listed companies in Malaysia and overseas.

At present Smart Focus employs 275 consultants, both local and international, allowing it to draw on global knowledge and provide solutions tailored to the local setting and is uniquely known for its straightforward approach to solving today's most complex business challenges. As for the Internal Audit function, it has 65 staff.

The Internal Audit ("IA") function is outsourced to Smart Focus Group. And it is headed by the Associate Director, Mr. Lee Fook Sun, who graduated from Australia with a Bachelor of Commerce and a Masters in Accountancy. He is also a member of MIA and CPA Australia as well as a professional member of the Institute of Internal Auditors Malaysian. He has vast experience and exposure more than 38 years in the IA field. The team is assisted by three other Internal Auditors in this assignment during the financial year under review. The three members are Ms. Sayyidatu Nisya binti Memoja, who has five years of experience with a Bachelor of Compliance and Risk Management, Mr. Hari Senthidesan, who has thirty-five years of audit experience and an engineering degree, and Ms. Adriana Mansor, who has four years of audit and risk experience and a marketing degree. The approved annual IA Plan is designed to cover entities across all levels of operations within the Group.

The IA firm appointed by the Company is independent of activities related to business operations and performs its duties in accordance with standards set by relevant professional bodies, namely the Institute of Internal Auditors. The IA personnel are free from any relationship and conflicts of interest.

By order of the Board
ENVICTUS INTERNATIONAL HOLDINGS LIMITED

DATO' JAYA J B TAN
Executive Chairman and Group CEO

5 February 2025