PINE CAPITAL GROUP LIMITED
(formerly known as "OLS Enterprise Ltd")
(Company Registration No. 196800320E)
(Incorporated in the Republic of Singapore)

RESPONSE TO QUERIES FROM THE SINGAPORE EXCHANGE REGULATION ON SUBSIDIARY COMMENCING LEGAL PROCEEDINGS AND UPDATE ON SUBSIDIARY

The board of directors (the "**Board**") of Pine Capital Group Limited (the "**Company**" and together with its subsidiaries, the "**Group**") refers to the Company's announcements dated 14 October 2019 and 15 October 2019 in relation to its subsidiary Advance Capital Partners Asset Management Private Limited ("**ACPAM**"). Unless otherwise defined, the terms and references used herein shall bear the same meaning as stated in the Announcements.

The Company would like to provide the Company's responses to queries raised by the Singapore Exchange Regulation ("**SGX RegCo**") on 17 October 2019. These responses are prepared based on the information and documents available to the Company at this point in time and the Company will make further announcements if and when required by SGX RegCo and/or its Sponsor, including further responses to queries arising from this announcement:

Query 1(a):

ACPAM's base capital as at August 2019 has fallen below the minimum base capital requirement as required of a RFMC. ACPAM has also informed MAS on 25 September 2019 of the deficiency in base capital. Why was the Company only informed on 11 October 2019?

Company's Response:

The Board understands that ACPAM was verifying details to determine the situation and provided both MAS and the Company further information on 11 October 2019. The Board further understands that due to the changes at ACPAM, the new Board needed some time to obtain the documents and information so as to provide the Company with accurate information.

Query 1(b):

What are the oversight by the Company's Board and management over the operations of its main operating subsidiary, ACPAM?

Company's Response:

At present, Mr Chan Wai Leung is a board member of ACPAM and acts as the Company's representative for an oversight of ACPAM. Due to the various changes in ACPAM, the Board understands that Mr Chan may take some reasonable time to familiarise himself with ACPAM's operations.

Query 2:

What is the impact on the suspension of ACPAM's RFMC licence to the Group?

Company's Response:

Since the letter by MAS dated 13 May 2019, ACPAM's fund management activities have been restricted which effectively limited ACPAM's ability to generate new business. The further suspension of the RFMC licence will have no material impact on the Group and will prevent the

need for additional capital raising or capital contribution by the Company to meet the base capital requirements.

Query 3:

When did the Company commence business in Pine Capital (Shanghai) Group Limited ("PCS")? What is the revenue contribution of PCS to the Group?

Company's Response:

PCS was incorporated on 16 January 2019. While there has been no substantial revenue to date in the setup phase, the Company is beginning to see, and expects to see revenue generated shortly.

Query 4:

Is the Group able to operate on a going concern?

Company's Response:

Based on the information and documents available, to the best of their knowledge and belief, the Board believes that the Group is able to operate on a going concern. In this regard, the Board is of the view that the impact arising from the loss of the one management share of ACF to ACPAM's revenues is minimal. At the same time, the Group is working to generate revenues from PCS (please also see answer to Query 3). Taking into account (i) the cash resources available to the Group, cash used in operating activities for the Group, (ii) rationalization of some of the overseas subsidiaries and (iii) the Company's plan to resume trading, the Board is of the view that the Group is able to continue operating as a going concern

Query 5:

Given the development, please provide the Board's justification on whether it is a cash company. Please note that the Exchange reserves the right to deem the Company as a cash company.

Company's Response:

The Board is of the opinion that, based on the legal advice obtained, it will be able to recover its rights to the one management share of ACF for ACPAM's business. Additionally, the Company has made a substantial investment to create a presence in China and it expects to see positive developments over the next few quarters.

DIRECTOR RESPONSIBILITY STATEMENT

The Directors accept full responsibility for the accuracy of the information given in this announcement and confirm after making all reasonable enquiries, that to the best of their knowledge and belief, this announcement constitutes full and true disclosure of all material facts or circumstances about the above mentioned responses, the Company and its subsidiaries, and the Directors are not aware of any facts the omission of which would make any statement in this announcement misleading.

Where information in this announcement has been extracted from published or otherwise publicly available sources or obtained from a named source, the sole responsibility of the Directors has been to ensure that such information has been accurately and correctly extracted from those sources and/or reproduced in this announcement in its proper form and context.

BY ORDER OF THE BOARD

Tomi-Jae Wanlun Tjio

Executive Chairman
21 October 2019

---

*This announcement has been prepared by the Company and its contents have been reviewed by the Company's sponsor ("**Sponsor**"), Asian Corporate Advisors Pte. Ltd., for compliance with the relevant rules of the Singapore Exchange Securities Trading Limited ("**Exchange**"). The Company's Sponsor has not independently verified the contents of this announcement including the correctness of any of the figures used, statements or opinions made.*

This announcement has not been examined or approved by the Exchange and the Exchange 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 Mr. Liau H.K..
Telephone number: 6221 0271