

RESPONSE TO QUERIES RAISED BY SINGAPORE EXCHANGE SECURITIES TRADING LIMITED ("SGX-ST")

In response to the queries raised by the SGX-ST on 24 April 2014 with regards to the Annual Report for the financial year ended 31 December 2013, the Directors of San Teh Ltd (the "Company" and together with its subsidiaries, the "Group") would like to provide following additional information:

SGX-ST's comments 1:

In its Annual Report 2013 on "Interested Person Transactions" ("IPTs") (page 90), the Company stated that "there was no significant interested person transaction for the financial year ended 31 December 2013". However, we note the Company's disclosure in paragraph 29 of the Notes to the Financial Statements on significant IPTs:-

- a) Repayment of non-trade advances obtained from 1. Director and 2. Companies in which a director has a substantial interest;
- b) Non-trade advances obtained from director; and
- c) Several subsidiaries of the Group obtained non-trade advances for their working capital purposes from director and companies in which a director has a substantial interest.

Please provide the disclosure required under Listing Rule 907 and reconcile these transactions with the Company's statement that "there was no significant interested person transaction for the financial year ended 31 December 2013".

The Company's response:

As stated on page 66 of the Company's Annual Report, the non-trade advances obtained from director and companies in which a director has a substantial interest are interest free. Therefore, the value of the IPTs is zero. Hence, the Company stated that there was no significant IPT for the financial year ended 31 December 2013 in its Annual Report.

SGX-ST's comments 2:

Paragraph 9.3 of the Code of Corporate Governance 2012 (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 under Listing Rule 1207(12), please make the disclosure as recommended in the Code or otherwise disclose and explain any deviation from the recommendation.

The Company's response:

For confidentiality and competitive reasons, the Company is not disclosing the aggregate remuneration paid to the Group's top five key management personnel (who are not directors or the CEO).

BY ORDER OF THE BOARD

Lim Wee Tziang
Company Secretary

25 April 2014