

RESPONSE TO THE SGX-ST'S QUERIES IN RELATION TO ANNOUNCEMENT DATED 16 OCTOBER 2019

The board of directors (the "**Board**" or the "**Directors**") of Atlantic Navigation Holdings (Singapore) Limited (the "**Company**", and together with its subsidiaries, the "**Group**") refers to the Company's announcement dated 16 October 2019 (the "**Previous Announcement**") in relation to the Company's responses to the queries received from the Company's sponsor, SAC Capital Private Limited, on 11 October 2019 on the unusual trading activities in the shares of the Company. The Company sets out below the responses to the queries received from the Singapore Exchange Securities Trading Limited ("**SGX-ST**") on 17 October 2019 in relation to the Previous Announcement.

1. How long has the debt been overdue?

The debt is mainly related to charter-hire charges, including some retention amounts withheld by end-customer based on contractual terms.

All the invoices, except for an invoice in September 2018 on a retention amount, are overdue for less than 5 months after taking into account the credit terms.

2. When was the letter of demand received by the Company?

The letter of demand was received on 3 October 2019, with on-going discussions with the creditor (see response to Query 3 below).

3. What does the debt relate to and would the non-payment of the debt affect the operations of the Company?

Please refer to response to Query 1 above on the nature of the debt.

The outstanding amount is less than 5% of the net asset value of the Group for the audited FY2018 as well as the unaudited 6 months ended 30 June 2019. The Group continues to generate positive cash flow from operations at relatively high utilization rates as previously announced.

In view of the challenging market environment where there are delays in payments from endcustomers which in turn are impacting the payment to the creditors, the Management works with its stakeholders including its debtors and creditors for working capital management on an on-going basis to overcome the current industry challenges. The Management wishes to update that it is finalising an in-principle amicable resolution with the creditor based on a repayment plan. As mentioned in the Previous Announcement, the letter of demand is not expected to materially affect the operations of the Group.

The Company will make the necessary announcement when there are material developments in due course.

By Order of the Board

Wong Siew Cheong Executive Director and Chief Executive Officer 22 October 2019

This announcement has been reviewed by the Company's sponsor ("**Sponsor**"), SAC Capital Private Limited. 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 Lee Khai Yinn (Tel: (65) 6232 3210) at 1 Robinson Road, #21-00 AIA Tower, Singapore 048542.