



PENGUIN INTERNATIONAL LIMITED

(Company Registration Number: 197600165Z)

RESPONSE TO SGX QUERY IN RELATION TO THE ANNUAL REPORT FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2019

The Board of Directors of Penguin International Limited (the “**Company**”) wishes to inform shareholders that the Company has received the following query from the Singapore Exchange Securities Trading Limited (“**SGX-ST**”) regarding the Annual Report 2019 and would like to set out its response as follows:

SGX-ST’s Query:

Provision 2.4 of the 2018 Code of Corporate Governance (the “Code”) states that “the Board and board committees are of an appropriate size, and comprise directors who as a group provide the appropriate balance and mix of skills, knowledge, experience, and other aspects of diversity such as gender and age, so as to avoid groupthink and foster constructive debate. The board diversity policy and progress made towards implementing the board diversity policy, including objectives, are disclosed in the company’s annual report.” (emphasis added)

Please disclose whether and how Provision 2.4 has been complied with. Where the Company’s practices vary from the provisions of the Code, please explicitly state the provision from which it has varied, explain the reason for variation, and explain how the practices adopted are consistent with the intent of the relevant principle in the Code as required by Listing Rule 710.

The Company’s response:

The Company recognises and embraces the benefits of diversity of experience, age, skill sets and gender on the Board and views board diversity as an essential element to support the attainment of its strategic objectives and sustainable development.

Although the Company does not have a written policy on board diversity, the Nominating Committee reviews the composition of the Board from time to time to ensure that the Board has sufficient diversity in terms of knowledge, skills, experience, independence, gender, age and other relevant factors. Gaps identified, if any, will be considered in determining the optimum composition of the Board and when possible, will be balanced appropriately.

As disclosed in the Board Size and Board Diversity section on page 33 of the Annual Report, the current Board composition provides diversity in terms of professional experience, skills and knowledge and also of other aspects such as gender and age.

BY ORDER OF THE BOARD

Heng Michelle Fiona
Company Secretary
6 May 2020