
**RESPONSE TO SGX REGCO QUERIES REGARDING ANNOUNCEMENTS DATED 17, 22
AND 23 SEPTEMBER 2026**

The board of directors (the “**Board**”) of Multi-Chem Limited (the “**Company**”, and together with its subsidiaries, the “**Group**”) refers to the queries raised by the Singapore Exchange Regulation (“**SGX RegCo**”) on 29 September 2026 in relation to the Company’s announcements dated 17, 22 and 23 September 2026.

The Board sets out below its responses to the queries raised by the SGX RegCo:

Query 1: Please state when M.Tech first received notification, whether formal or informal, from the Key Vendor regarding the suspension of all order acceptances, marketing and business development activities and commercial communications (“all orders”) with M.Tech (“Key Vendor Notification”).

Company’s Response:

M.Tech Products Pte. Ltd. (“**M.Tech**”) first received written notification regarding the order suspension via email from the Key Vendor on Sunday, 20 September 2026 at approximately 11:07 PM. Concurrently, a separate communication from the vendor was sent directly to regional personnel of the Group dealing with the affected products late Sunday night on 20 September 2026.

Query 2: Please state when the Company and the Board was informed that the Key Vendor was suspending all orders with M.Tech and when the Company first assessed that the suspension of all orders may have a material adverse impact on the consolidated NTA and EPS of the Group.

Company’s Response:

The management of the Company (“**Management**”) informed the Board of the receipt of the Key Vendor Notification on Monday morning, 21 September 2026 at 9:41 AM via email. At the time of initial notification on 21 September 2026, Management noted that the communication referenced a suspension rather than a contract termination. Upon notification of the matter, the Board requested Management to ascertain the materiality of the suspension of order acceptances. To evaluate the potential implications, Management requested the Group’s Finance team on the same day to compile year-to-date (“**YTD**”) financial income contribution data regarding the Key Vendor.

The Group’s Finance team provided the compiled 1H2026 income contribution metrics to Management on Tuesday morning, 22 September 2026. Following a review of the financial data and further to consultations with external legal advisors, on Tuesday afternoon, 22 September 2026, the Company and the Board determined that the suspension of orders by the Key Vendor likely constituted material information that could have a material adverse impact on the consolidated Net Tangible Assets (NTA) per share and Earnings Per Share (EPS) of the Group for FY2026 and required disclosure.

Query 3: If the Company and/or M.Tech was informed prior to 23 September 2026, please provide a timeline from receipt of Key Vendor Notification till the Company's announcement on 23 September 2026.

Company's Response:

The chronological timeline from the receipt of the Key Vendor Notification to the SGXNET publication on 23 September 2026 is set out below:

Date	Event or Action Taken
Sunday, 20 September 2026 (11:07 PM)	Executive director received written email notification from the Key Vendor regarding the immediate suspension of order acceptances.
Monday, 21 September 2026 (9:41 AM)	Management escalated the vendor notification to the Board and concurrently communicated with external legal counsels for advice.
Monday, 21 September 2026	The Board requested Management to ascertain materiality of the suspension and Management instructed the Financial Controller to compile YTD sales and gross profit contribution data for the Key Vendor relative to Group performance.
Tuesday, 22 September 2026, morning	Financial Controller delivered the 1H2026 financial contribution report to Management.
Tuesday, 22 September 2026, afternoon	Management obtained legal advice on disclosure obligations under Mainboard Rule 703 and Practice Note 7.1 taking into account legal consequences of disclosure arising from confidentiality obligations owed to the Key Vendor. The Board determined that the matter was likely material and required public disclosure.
Wednesday, 23 September 2026	External legal counsel was instructed to draft the SGXNET announcement. The draft announcement was prepared, reviewed, and approved by the Board.
Wednesday, 23 September 2026 (7:49 PM)	The Company released the announcement titled "Receipt of Notice of Suspension of Orders from a Key Vendor" via SGXNET.

Query 4: During the period between receipt of Key Vendor Notification and SGXNet announcement of 23 September 2026, please clarify (a) who within the Company was aware of the matter and (b) whether and if so, what confidentiality measures were implemented.

Company's Response:

During the relevant period, awareness of the Key Vendor Notification within the Company was restricted strictly to:

- (a) members of the Board;
- (b) key executive officers and the Group's Financial Controller; and
- (c) regional personnel across affected overseas offices (including product managers, product team leads, pre-sales consultants, engineers, solution architects, country managers, inside sales, and general sales personnel) who were either notified directly by the Key Vendor's regional team or informed internally on an operational need-to-know basis to manage business operations, order processing, and workflow continuity.

All internal personnel aware of the matter are subject to strict secrecy and confidentiality undertakings under their employment contracts, or statutory director and officer fiduciary obligations. Information communicated internally was strictly restricted to personnel on an operational need-to-know basis for ongoing business execution.

Query 5: It was noted that the two executive directors and senior employees were informed on 14 September 2026 to attend an interview. Please disclose the escalation policy and procedures in place when directors, executive officers or key employees become aware of investigations, regulatory inquiries or law enforcement actions involving themselves. Please also provide an explanation as to why the ARMC and/or the Board of Directors were not informed till the night of 16 September 2026.

Company's Response:

The Company maintains standard corporate governance practices requiring directors, executive officers, and key management personnel to report any material regulatory, legal, or law enforcement developments affecting the Group or their capacity to serve the Group expediently to the Board. The Company does not currently have a standalone, written policy document dedicated exclusively to law enforcement investigation escalation procedures.

The Company's explanation for the notification timeline regarding the interviews is as follows:

- (a) On 14 September 2026, two executive directors (i.e. Mr Foo Suan Sai and Mdm Han Juat Hoon) and two senior employees (i.e. Mr Ker Jian Yan and Mr Pui Boon Tiong) were notified to attend interviews with the Corrupt Practices Investigation Bureau (CPIB).
- (b) The last of such interviews concluded only on 15 September 2026.
- (c) Management and the Board were informed of the attendance of the two senior employees on 16 September 2026.
- (d) During the proceedings, the relevant authority issued confidentiality warnings regarding the investigation. Thus, following the conclusion of their interviews, Mr Foo Suan Sai and Mdm Han Juat Hoon immediately sought legal advice to determine the permissible scope of disclosure to the Company without breaching statutory investigation confidentiality requirements.

- (e) The extent of permitted disclosure was clarified on 16 September 2026, and on the night of 16 September 2026, the Audit and Risk Management Committee (the “**ARMC**”) and the Board were informed of the matters that were eventually announced.
- (f) A request for a Trading Halt was submitted early the following morning on 17 September 2026 at 7:51 AM, prior to market opening, and the public announcement was subsequently released on 17 September 2026.

Query 6: Please disclose whether the Board has reviewed the effectiveness of the Company's escalation procedures in light of any delays in notifying the Board of the CPIB interviews and the Key Vendor Notification.

Company's Response:

The Board and the ARMC are currently reviewing the Group's internal escalation practices in light of the recent developments. Management and the Human Resources department have been instructed to review existing procedures and, if necessary, draft a formalised, written escalation policy for the Board's evaluation and adoption.

By Order of the Board
Chong Teck Sin
Director

2 October 2026