BRITISH AND MALAYAN HOLDINGS LIMITED
(Company Registration No.201632914Z)
(Incorporated in the Republic of Singapore)

RESPONSE TO SGX QUERY RELATING TO THE COMPANY'S ANNOUNCEMENT RELEASED ON 5 OCTOBER 2022

The Board of Directors (the "**Board**") of British and Malayan Holdings Limited (the "**Company**") wishes to provide the following information in response to the queries raised by the Singapore Exchange Securities Trading Limited ("SGX-ST") in relation to the Company's announcement dated 5 October 2022 regarding the Company's Annual Report for the Financial Year ended 30 June 2022.

Query by SGX-ST:

Listing Rule 1207(19) provides that a listed issuer and its officers should not deal in the listed issuer's securities during the period commencing one month before the announcement of the company's half year and full year financial statements (if the issuer does not announce its quarterly financial statements).

We note from page 66 of the Annual Report that the Company's policy prohibits its directors and employees from share dealings for the period commencing two weeks before the release of half yearly results and one month before the release of the full-year results. Please explain how the Company's policy and practices comply with Listing Rule 1207(19).

Company's Response:

As part of the efforts to comply with Listing Rule 1207(19), the Company will circulate written reminders before each relevant prohibition period of one month before the announcement of the company's half year and full year financial statements to remind the Company and officers of the Company and its subsidiary, British Malayan Trustee Limited, on the prohibition to deal in the Company's securities during the close window period.

In addition, the Company's internal policy requires all employees of the Company and its subsidiary to disclose all their personal holdings in securities and unit trust funds of any other forms of trading / investments every quarter.

Such information as disclosed by the employees will be checked and verified by the Head of Compliance to ensure that all employees do not trade in shares of the Company to avoid any potential insider trading.

The Company's internal policy also requires all employees to submit a pre-trade clearance form to the Resident Manager or the Head of Compliance of British Malayan Trustee Limited for approval. The purpose of the pre-trade clearance is to ensure that all employees who wishes to trade in the Company shares and/or trading of any new forms of investment, received an official approval, thus pre-empting the Company's management team to be mindful of the relevant prohibition / close window period of one month in lieu of the Listing Rule 1207(19), in reference to the Company shares. Therefore, we shall also align our internal policy to be in line to the Listing Rule 1207(19).

The Head of Compliance will strictly monitor the quarterly declarations and all pre-trade clearance forms as submitted by all staff and shall report immediately to the Company if there are any red flags or suspicions.

The Company is also monitoring daily, the Company's share prices for any major fluctuation to the share price and trading volume.

BY ORDER OF THE BOARD

Angela Ho Wei Ling/ Chan Lai Yin
Companies Secretaries

13 October 2022