

## **Sunningdale Tech Ltd**

(Incorporated in the Republic of Singapore)

(Company Registration No.: 199508621R)

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### **RESPONSE TO SGX-ST'S QUERIES ON THE ANNUAL REPORT FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2018**

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**The Board of Directors of Sunningdale Tech Ltd (the "Company") refers to the queries raised by SGX-ST on the Annual Report ended 31 December 2018 and wishes to provide further information as follows:-**

#### **SGX-ST's Query**

*Listing Rule 715(2) provides that the issuer must engage a suitable auditing firm for its significant foreign-incorporated subsidiaries and associated companies.*

*We note that some of the foreign-incorporated subsidiaries and associated companies listed on pages 108 to 111 are audited by Tianjin Jinhua Certified Public Accountants Ltd, P.J. Accounting & Consultant Co. Ltd., GD Zhong Qian Certified Public Accountants or not required to be by the laws of their respective countries of incorporation. Please clarify if these entities are significant. If so, please provide us with the Company's and the Audit Committee's assessment of the suitability of the aforesaid audit firms and their basis for the said assessment.*

#### **Company's response**

We would like to confirm the subsidiaries listed on pages 108 to 111 which are audited by Tianjin Jinhua Certified Public Accountants Ltd, P.J. Accounting & Consultant Co. Ltd., GD Zhong Qian Certified Public Accountants or not required to be by the laws of their respective countries of incorporation are not significant entities to the Group.

In addition to our disclosure on Page 41 of the Annual Report which state "The ARC and the Board of directors of the Company have satisfied themselves that in appointing the auditing firms for the Company and its subsidiaries, Rule 712 and 716 of the Listing Manual have been complied with.", we would like to confirm the Company has complied with Rule 715(2).

### **SGX-ST's Query**

Guideline 9.3 of the Code of Corporate Governance 2012 (the "Code") provides that the issuer 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 710, please make the disclosure as recommended in the Code; or otherwise disclose and explain any deviation from the recommendation.

### **Company's response**

We would like to refer to the disclosure on Page 134, Note 31 (b) of Annual Report, the compensation to "Other key management personnel" which refer to total compensation paid to key management personnel who are not directors or the CEO.

BY ORDER OF THE BOARD

DOROTHY HO  
Company Secretary  
3 April 2019