



ASPIAL CORPORATION LIMITED

(Incorporated in Singapore)

(Company Registration No. 197001030G)

RESPONSE TO SGX-ST'S QUERY REGARDING ANNUAL REPORT FOR FINANCIAL YEAR ENDED 31 DECEMBER 2013

The Board of Directors (the "Board") of Aspi Corporation Limited (the "Company") refers to the query from the Singapore Exchange Securities Trading Limited on its Annual Report for the financial year ended 31 December 2013 and wishes to provide additional information as follows:-

Query 1:

As required by Rule 1207(12) of the Listing Manual, please make disclosures as recommended in paragraph 9.2 of the Code of Corporate Governance 2012 (the "Code") or otherwise explain the reason(s) for the deviation from the following Code recommendations. Paragraph 9.2 of the Code states that the Company should fully disclose the remuneration of each individual director and the CEO on a named basis. For administrative convenience, the Company may round off the disclosed figures to the nearest thousand dollars. There should be a breakdown (in percentage or dollar terms) of each director's and the CEO's remuneration earned through base/fixed salary, variable or performance-related income/bonuses, benefits in kind, stock options granted, share-based incentives and awards, and other long-term incentives.

Company's Response

The Company wishes to clarify that the disclosure made in page 32 of the annual report:

"The Board has reviewed the disclosure of the remuneration of the Directors and the key executives and has decided not to disclose the name of the key employees and remuneration **of the Board** as the Board believes that the disclosure may be prejudicial to its business given the competitive business environment and the disadvantages such as staff retention issues that it may bring."

Query 2:

Paragraph 9.4 of the Code of Corporate Governance 2012 (the "Code") states that for transparency, the annual remuneration report should disclose the details of the remuneration of employees who are immediate family members of a director or the CEO, and whose remuneration exceeds S\$50,000 during the year. This will be done on a named basis with clear indication of the employee's relationship with the relevant director or the CEO. Disclosure of remuneration should be in incremental bands of S\$50,000. The company need only show the applicable bands. We note that the band disclosed by the Company for employees who are immediate family members states "above S\$50,000", instead of in incremental bands of S\$50,000. As required by Rule 1207(12) of the Listing Manual, please make disclosures as recommended in paragraph 9.4 of the Code or otherwise explain the reason(s) for the deviation from the following Code recommendations.

Company's Response

For FY2013, employee who is related to Directors or Substantial Shareholders and where remuneration exceeds \$50,000 during the year is as follows:

S\$6,250,000 to S\$6,300,000 Ng Sheng Tiong (Spouse of Koh Lee Hwee)

By Order Of The Board

Submitted by: Lim Swee Ann, Company Secretary on 28/04/14 to the SGX