

UMS HOLDINGS LIMITED
Company Registration No.: 200100340R
(Incorporated in Singapore)

**RESPONSE TO QUERIES FROM THE SINGAPORE EXCHANGE SECURITIES
TRADING LIMITED (“SGX-ST”) ON THE ANNUAL REPORT FOR THE FINANCIAL
YEAR ENDED 31 DECEMBER 2011 (“ANNUAL REPORT”)**

The Board of Directors (the “Board”) of UMS Holdings Limited (the “Company”) wishes to provide the following information in response to SGX-ST’s queries on 17 April 2012 in connection with the Company’s Annual Report for the financial year ended 31 December 2011 (“Annual Report”):

SGX-ST’s Query 1:

Compliance with Rule 1207(10)

For the purpose of complying with Listing Rule 1207(10) of the Listing Manual, please note that:

- a. A disclaimer to the effect of *“absence of evidence to the contrary”* is NOT allowed in the opinion;
- b. The Board and the Audit Committee must opine whether the internal controls are adequate to address all 3 areas of risks (ie: financial, operational and compliance risks). Words to the effect of *“In its current business environment”* or *“business operations”* without express mention of all the 3 risk areas are not acceptable; and
- c. Both the Board and the Audit Committee must provide the opinion: *“the Board and the Audit Committee believes”* is not acceptable.

We note that the confirmation at page 26 of the Annual Report is not consistent with guideline (a) stated above. Hence, please provide a clean opinion that it is in compliance with Listing Rule 1207(10).

Company’s Response:

In addition to page 26 of the Annual Report on Internal Controls, the Company wishes to provide the below additional information.

The Audit Committee has reviewed the Company’s system of internal controls and is satisfied that the overall systems of controls are adequate to meet the needs of the Group in its current environment. Based on the reports by both external and internal auditors, the Board, with the concurrence of the Audit Committee is satisfied that there are adequate internal controls in place for the Group to address financial, operational and compliance risks during the year.

SGX-ST's Query 2:

Compliance with Rule 1207(6)(b)

Rule 1207(6)(b) of the Listing Manual requires disclosure in the Annual Report on the confirmation by the Audit Committee that it has undertaken a review of all non-audit services provided by the auditors and they would not, in the Audit Committee's opinion, affect the independence of the auditors.

Please confirm whether the Audit Committee has reviewed all non-audit services provided by the auditors and whether these services would not, in the Audit Committee's opinion, affect the independence of the auditors.

Company's Response:

In addition to page 25 of the Annual Report on Audit Committee, the Company wishes to provide the below additional information.

The Audit Committee confirms that it has undertaken a review of all non-audit services provided by the Company's auditors during the year, and is satisfied that the nature and extent of these services does not, in the Audit Committee's opinion, affect the independence of Moore Stephens LLP as our external auditors.

By Order of the Board

Luong Andy
Chief Executive Officer
19 April 2012