

Sunningdale Tech Ltd

(Incorporated in the Republic of Singapore)

(Company Registration No.: 199508621R)

RESPONSE TO SGX-ST'S QUERIES ON THE ANNUAL REPORT FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2017

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 2017 and wishes to provide further information as follows:-

SGX-ST's Query

Guideline 9.3(4) of the Code of Corporate Governance 2012 (the "Code") states that the Company should, *inter alia*, "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 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 38 of the Annual Report which states that "In view of the confidentiality of remuneration matters, the Board is of the opinion that it is in the best interest of the Group not to disclose the exact remuneration of the Non-Executive Director, Independent Directors, CEO, Executive Director and the Key Management Personnel in this Annual Report".

We would also like to confirm that "Key Management Personnel" refers to the top five key management personnel who are not directors or the CEO.

Therefore, the deviation from the recommendation has been disclosed and explained.

SGX-ST's Query

We note that the Company stated on page 44 of the Annual Report that *“the Group has procedures in place, including prohibition in insider trading, which restricts the dealing in the Company’s shares during the periods commencing one month (for the Group’s half yearly and full year results) and two weeks (for the Group’s quarterly results) prior to the announcement of the Group’s results and ending on the date of the announcement of the results. . .”*.

Please clarify whether these *“procedures”* prohibits the Group and its officers from dealing with the Company’s securities during the aforesaid periods as per Listing Rule 1207(19)(c); and the Company’s compliance with Listing Rule 1207(19)(c).

Company’s response

We would like to confirm the procedures prohibits the Group and its officers from dealing with the Company’s securities as per Listing Rule 1207 (19)(c), and that the Company complies with Listing Rule 1207(19)(c).

BY ORDER OF THE BOARD

DOROTHY HO
Company Secretary
9 April 2018