



**RESPONSE TO SGX QUERY ON ANNUAL REPORT FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2017**

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The Board of Directors (the “Board”) of Bonvests Holdings Limited (the “Company”) refers to the queries raised by the Singapore Exchange Securities Trading Limited (“SGX-ST”) on 20 April 2018 regarding the disclosure of information in the Corporate Governance Statement in the Company’s 2017 Annual Report. The Board sets out its response as follows:

**SGX Query**

Guideline 9.3 of the Code of Corporate Governance 2012 (the “Code”) provides that the Company should, inter alia, “name and disclose the remuneration of at least 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**

The top 5 key management personnel comprises general managers and financial controllers in the Group’s industrial division and in the Group’s hotel operations across different jurisdictions. Under the foreign jurisdictions, there is no requirement for corporations to disclose the detailed remuneration of individual executives. The disclosure in Singapore would affect the confidentiality of their remuneration. The foreign subsidiaries would be put into a position of unequal treatment in governing the confidentiality of their employees’ remuneration. Such foreign executives would be disadvantaged unfairly.

Disclosure of the names of the key management personnel will give rise to pay comparisons when remuneration among them are not comparable as remuneration among jurisdictions vary according to different market conditions and cost and standard of living.

In addition, given the highly competitive conditions in the local and foreign market place where poaching of executives is not uncommon, it is not in the interest of the Company to disclose the remuneration of individual executives. The Board is of the view that it would be disadvantageous to the Group to detail the remuneration of its top 5 key management personnel.

By order of the Board  
Foo Soon Soo  
Company Secretary

24 April 2018