

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

The Board of Directors ("the Board") of Intraco Limited ("the Company" or together with its subsidiaries, "the Group") refers to the queries raised by Singapore Exchange Securities Trading Limited ("SGX-ST") on 20 April 2018 in relation to the Company's Annual Report for the financial year ended 31 December 2017 and wishes to provide the following information:

SGX-ST's Queries:

(a) Listing Rule 715(2) states that the Company should "must engage a suitable accounting firm for its significant foreign-incorporated subsidiaries and associated companies".

We note that on pages 147 to 148 of its Annual Report, the Company stated that its foreign-incorporated subsidiaries and associated companies are: (i) "audited by Shanghai Mingyu Certified Public Accountant Co., Ltd., People's Republic of China"; or (ii) "audited by P.S. Yap, Isma & Associates, Chartered Accountants, Malaysia" With regard to these entities,:-

- (i) Please state if the foreign-incorporated subsidiaries and associated companies in question are significant.
- (ii) If so, please state (2) the Board and Audit Committee's assessment of their suitability; and (3) their basis for the same.

Company's response:

The Company's foreign-incorporated subsidiaries namely, Intraco International (Shanghai) Co., Ltd, and K.A. Vermiculite Spray Sdn Bhd accounted for 2.9% and -0.1% of the net tangible assets of the Group as at 31 December 2017 and 0.1% and -0.2% of the pre-tax profit of the Group for the year ended 31 December 2017, respectively. As such, these foreign-incorporated subsidiaries are, in accordance with the definitions set out under Rule 718 of SGX Listing Rules Manual, not considered to be significant to the Group.

As set out on page 148 Note (iv) of the 2017 Annual Report, these foreign-incorporated subsidiaries were dormant during the year.

Note: SGX Listing Rule 718 states that a subsidiary or associated company is considered significant if its net tangible assets represent 20% or more of the issuer's consolidated net tangible assets, or its pre-tax profits account for 20% or more of the issuer's consolidated pre-tax profits.

By Order of the Board

Josephine Toh
Company Secretary

Date: 24 April 2018