



BENG KUANG MARINE LIMITED

Registration No. 199400196M

RESPONSE TO SGX QUERIES IN RESPECT OF THE ANNUAL REPORT FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2012

The Board of Directors of Beng Kuang Marine Limited (the "Company") refers to the queries raised by Singapore Exchange Securities Trading Limited ("SGX-ST") on 8 April 2013 in respect of the Company's Annual Report for the financial year ended 31 December 2012 ("AR2012") and wishes to respond as follows:-

Query 1: Guideline 9.2 of the Code of Corporate Governance 2005 (the "Code") states that the Company should name and disclose the remuneration of directors and at least the top five key executives (who are not also directors) in bands of S\$250,000.

We note that on pages 19 and 20 of the AR2012, the Company disclosed the number of directors and key executives in remuneration bands of S\$250,000. The Company did not name the directors and the top five key executives.

Please explain the reason(s) for the deviation from the Code as required under Listing Rule 710.

Company's response:

The Company wishes to provide a breakdown, showing the level and mix of remuneration of each individual Director and top five key executives (who are not also directors) for the financial year ended 31 December 2012 as follows:-

Name of Directors	Salary#	Bonus	Fees*	Benefits	Total
	(%)	(%)	(%)	(%)	(%)
S\$250,001 to S\$500,000					
Chua Beng Kuang	92.27	7.52	0.21	-	100.00
Chua Meng Hua	90.69	7.40	1.91	-	100.00
Up to S\$250,000					
Yong Thiam Fook	91.76	7.35	0.89	-	100.00
Goh Chee Wee	-	-	100.00	-	100.00
Dr Wong Chiang Yin	-	-	100.00	-	100.00
Ali Abdulla Ahmad Bin Towaih	-	-	100.00	-	100.00
Cheong Hock Wee	-	-	100.00	-	100.00

Name of Top 5 Executive Officers	Salary# (%)	Bonus (%)	Fees* (%)	Benefits (%)	Total (%)
S\$250,001 to S\$500,000					
Chua Beng Yong (COO)	92.55	7.45	-	-	100.00
Chua Beng Hock (Deputy COO)	91.35	7.20	1.45	-	100.00
Up to S\$250,000					
Phoon Kim Sin (Director, Corporate Finance & Special Projects)	92.75	7.25	-	-	100.00
Lee Wei Liang (CFO)	92.92	7.08	-	-	100.00
Tan Say Tian (GM)	92.53	7.47	-	-	100.00

Salary is inclusive of fixed allowance and CPF contributions.

* These fees are subject to approval of the shareholders at the annual general meeting.

Query 2: We refer to the Company's disclosure in relation to dealings in the Company's securities on page 22 of the AR2012.

- (a) Please note that the correct listing rule reference is Rule 1207(19) of the Listing Manual, instead of Rule 1207(18) of the Listing Manual. Please amend accordingly.
- (b) Please specify the "black-out periods" during which the Company and its officers are not allowed to deal in the Company's shares.

Company's response:

- (a) The Company has adopted policies in line with the requirements of Rule 1207(19) of the Listing Manual of the SGX-ST on dealings in the Company's securities.
- (b) The Company and its officers are not allowed to deal in the Company's shares during the period commencing two (2) weeks before the announcement of the Company's financial results for each of the first three (3) quarters and one (1) month before the announcement of the Company's full year financial results, as the case may be, and ending on the date of the announcement of the relevant financial results.

BY ORDER OF THE BOARD

Chua Meng Hua
Managing Director
10 April 2013