SHS HOLDINGS LTD.
(Company Registration No. 197502208Z)

RESPONSE TO QUERIES FROM THE SINGAPORE EXCHANGE SECURITIES TRADING LIMITED (THE "SGX-ST") ON THE COMPANY'S ANNUAL REPORT 2014

The Board of Directors of SHS Holdings Limited (the "**Company**", and together with its subsidiaries, the "**Group**") refers to the queries raised by the SGX-ST on 23 April 2015 and responds as follows:-

SGX-ST's query 1

1. As required by Rule 1207(12) of the Listing Manual, please make disclosures as recommended in paragraph 9.3 of the Code of Corporate Governance 2012 (the "Code") or otherwise explain the reason(s) for the deviation from the following Code recommendations. Paragraph 9.3 of the Code states that the Company should disclose in aggregate the total remuneration paid to the top five key management personnel (who are not directors or the CEO).

The Company's response:

The annual aggregate remuneration paid to Director and top 5 key management personnel of the Company that disclosed under Note 33 of the financial statement will be revised with further breakdowns as follow:

Note 33 (Disclosure in the Financial Statement)	**Group**	
	2014 S$'000	2013 S$'000
Key management personnel compensation		
The remuneration of executive directors and key management is as follows:		
Salaries and other short-term employee benefits	4,391	3,053
Defined contribution plans	108	108
	4,499	3,161
Directors' fees to non-executive directors	219	224
	4,718	3,385

Further Breakdown:-

Comprise amounts paid to:		
Directors of the Company	2,736	2,184
Key management personnel	1,982	1,201
	4,718	3,385

SGX-ST's query 2

2. It was disclosed on page 31 that "The Company has applied net proceeds of S$7,111,000 arising from the Warrants Issue and exercise of the Warrants for the Group's investments in energy drilling and property development businesses in Singapore and the Group's working capital." Please disclose a breakdown with specific details on the use of proceeds for working capital purposes.

The Company's response:

The breakdown of the use of proceeds is as follows:-

Details	**Amount (S$'000)**
Energy Drilling	5,233
Property Development Business	1,873
Working capital purposes	5
Total	7,111

By Order of the Board
SHS HOLDINGS LTD.
Ng Han Kok, Henry
Group CEO
24 April 2015