



**KINGSMEN CREATIVES LTD.**

(Company Registration Number: 200210790Z)

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## RESPONSES TO QUERIES ON 2020 ANNUAL REPORT FROM THE SINGAPORE EXCHANGE SECURITIES TRADING LIMITED

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The Board of Directors (the “**Board**”) of Kingsmen Creatives Ltd. (the “**Company**” and together with its subsidiaries, the “**Group**”) wishes to provide the following information in response to the queries raised by the Singapore Exchange Securities Trading Limited on 21 April 2021:

### SGX-ST’s query 1

Listing Rule 1207 (10c) requires issuers to disclose the Audit Committee’s comment on whether the internal audit function is independent, effective and adequately resourced. We note that the Company disclosed that “(i) the internal audit function is adequately resourced and has appropriate standing within the Group; and (ii) the recommendations of the internal auditors are properly implemented.” Please confirm that the Audit Committee is satisfied that the internal audit function is independent, effective and adequately resourced per Listing Rule 1207 (10c).

### Company’s response

The Audit Committee confirms that it is satisfied that the internal audit function is independent, effective and adequately resourced per Listing Rule 1207 (10c).

### SGX-ST’s query 2

Listing Rule 710 requires issuers to explicitly state, when deviating from the provisions prescribed in the Code of Corporate Governance 2018 (the “**Code**”), an explanation on how the practices it had adopted are consistent with the intent of the relevant principle. Practice Guidance 2.4 of the Code states that the board diversity policy and progress made towards implementing the board diversity policy, including objectives, are disclosed in the company’s annual report. The board and its board committees should comprise directors who as a group provide an appropriate balance and diversity of skills, experience, gender and knowledge of the issuer. They should also provide core competencies such as accounting or finance, business or management experience, industry knowledge, strategic planning experience and customer-based experience or knowledge. We note that the Company indicated “Overall, the Board is of the view that, notwithstanding that the Company may not currently have a written policy on board diversity, the Board’s current composition and size on a holistic basis provide an appropriate balance and mix of skills, independence, experience and knowledge of the Board, and other aspects of diversity such as gender and age, which avoid groupthink, foster constructive debate and facilitates effective decision-making in the best interests of the Group”. Please confirm this practice is consistent with the intent of Practice Guidance 2.4 of the Code.

### Company’s response

The Board confirms that the practice is consistent with the intent of Practice Guidance 2.4 of the Code.

## BY ORDER OF THE BOARD

Soh Siak Poh Benedict  
Executive Chairman

21 April 2021