

RESPONSE TO SGX-ST QUERIES RECEIVED ON 25 APRIL 2024

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The board of directors (the “**Board**”) of Pacific Radiance Ltd. (the “**Company**”, and together with its subsidiaries, the “**Group**”) sets out its responses to the queries raised by the Singapore Exchange Securities Trading Limited (“**SGX-ST**”) on 25 April 2024 in relation to the annual report of the Company for financial year ended 31 December 2023 (“**Annual Report FY2023**”):

Query by SGX-ST	
1	<p>We note that the Company had disclosed on Page 35 of the Annual Report FY2023 that there are no interested person transactions (“IPT”) entered into by the Group during the course of FY2023 yet reported related party transactions (“RPT”) under Note 33 on Page 103 of the Annual Report FY2023 relating to sale and purchase of goods and services for continuing operations, that involve, inter alia, ENAV Radiance Group, which in aggregate, exceeds 5% of the Company’s FY2022 Net Tangible Assets of \$23,730,000. Please clarify whether the RPT are also IPT pursuant to Chapter 9 of the Listing Manual and explain how the Company had complied with the relevant Listing Rules.</p> <p><u>Company’s Response</u></p> <p>ENAV Radiance Pte Ltd is the holding company of the ENAV Radiance Group. Mr Pang Wei Kuan, James is a director (Mr Pang Wei Meng is the alternate director to Mr Pang Wei Kuan, James) of ENAV Radiance Pte Ltd. Mr Pang Wei Kuan, James and Mr Pang Wei Meng are also the CEO and Executive Directors of the Company respectively.</p> <p>In accordance with SFRS(I) 1-24: Related Party Disclosures, ENAV Radiance Group is considered a related party as Mr Pang Wei Kuan, James being a director of ENAV Radiance Pte Ltd is deemed to have significant influence over ENAV Radiance Pte Ltd even though he does not control the board of ENAV Radiance Pte Ltd.</p> <p>In accordance with Chapter 9 of the Listing Manual, ENAV Radiance Pte Ltd is not considered an associate of Mr Pang Wei Kuan, James as he and his immediate family together do not own 30% or more interest in ENAV Radiance Pte Ltd. ENAV Radiance Pte Ltd is not an interested person under the definition of the Listing Manual.</p> <p>Hence the RPT between ENAV Radiance Pte Ltd and the Company are not IPT pursuant to Chapter 9 of the Listing Manual.</p>

**Query by SGX-ST (cont'd)**

2 Listing Rule 710A requires an issuer to maintain a board diversity policy that addresses gender, skills and experience, and any other relevant aspects of diversity. An issuer must describe in its Annual Report FY2023 its board diversity policy, including the following:  
 (a) the issuer's targets to achieve diversity on its board;  
 (b) the issuer's accompanying plans and timelines for achieving the targets;  
 (c) the issuer's progress towards achieving the targets within the timelines; and  
 (d) a description of how the combination of skills, talents, experience and diversity of its directors serves the needs and plans of the issuer.

While we note that "the Nominating Committee ("NC") is satisfied that the three new Directors bring expertise and experience in key markets of the Group and areas of finance, corporate finance, technology and digitalisation that are important to the growth of the Group" from Page 17 of Annual Report FY2023, the Company had not provided any specific targets, accompanying plans, timelines and progress in relation to its Board Diversity Policy. Please further elaborate pursuant to Listing Rule 710A.

Company's Response

As disclosed on Page 17 of Annual Report FY2023, the NC recognises the need to have gender diversity on the Board. Accordingly, one of the objectives of the NC is to seek and propose potential female candidates for the role of director, who would expand the skill repertoire of the Board, within the next 3 years.

3 Pursuant to the renounceable non-underwritten rights issue (the "Rights Issue") announced on 3 November 2023 that was undertaken by the Company, please provide a status report on the use of IPO proceeds and any proceeds arising from the Rights Issue and whether the use of proceeds is in accordance with the stated use and allocation disclosed in the Rights Issue announcements, as required under Listing Rule 1207(20).

Company's Response

The intended uses of such Net Proceeds are set out below:

Use of Final Net Proceeds	Amount S\$ million	Percentage Allocation
Provision for acquisition of vessels	14.12	62%
Repayment of bank borrowings	8.65	38%
Total	22.77	100%

Use of Proceeds from Rights Issue:

Use of Final Net Proceeds	Amount S\$ million	Percentage Allocation
Acquisition of vessels and reactivation costs of vessels	11.00	48%
Repayment of bank borrowings	8.65	38%
	19.65	86%

Proceeds from Rights Issue to be used is S\$3.12 million.

By Order of the Board of  
Pacific Radiance Ltd.

Pang Yoke Min  
Executive Chairman

30 April 2024