



GLOBAL INVACOM GROUP LIMITED

(formerly known as Radiance Group Limited)
(Incorporated in Singapore)
(Company Registration No: 200202428H)

RESPONSE TO SGX-ST QUERIES ON ANNUAL REPORT FOR FY2012

DMG & Partners Securities Pte Ltd (“DMG”) was the financial adviser to Global Invacom Group Limited in relation to the acquisition of Global Invacom Holdings Limited (“GIHL”). DMG assumes no responsibility for the contents of this announcement.

The Board of Directors of Global Invacom Group Limited (the “**Company**”), refers to the queries raised by the Singapore Exchange Securities Trading Limited (“**SGX-ST**”) on 19 April 2013 in respect of the Company’s Annual Report for the financial year ended 31 December 2012 (“**FY2012**”) (the “**Annual Report**”) and wishes to respond as follows:

Query 1:

Listing Rule 1207(10) provides that the Board and the Audit Committee must opine whether the internal controls are adequate to address financial, operational and compliance risks. We note that the confirmation provided in your annual report is not consistent with the guidelines stated above. Please provide a clean opinion that is in compliance with Listing Rule 1207(10).

Company’s response:

The Audit and Risk Committee (“**ARC**”) and the Board wish to re-issue their opinion, as follows:

The Board, with the concurrence of the ARC, is of the opinion that the Group’s internal controls are adequate in addressing financial, operational and compliance risks in the Group’s current business environment based on:

- (a) reviews of internal controls established and maintained by the Group;
- (b) Management’s annual undertaking confirming their responsibilities for and effectiveness of the internal controls;
- (c) reviews and assessment of risks; and
- (d) reports issued by the internal and external auditors.

Query 2:

Guideline 9.2 of the Code of Corporate Governance states that the Company should set out the names of directors and at least the top 5 key executives (who are not also directors) earning remuneration which falls within bands of S\$250,000. We note that on page 17 of the Annual Report, the Company did not disclose remuneration of its top 5 key executives. Please explain the reason(s) for the deviation from the Code.

Company's response:

The Company had only disclosed the remuneration bands of Mr David Gerald Smith and Mr Goh Boon Leng in the Annual Report as they are the 2 of the 3 top key executives of the Company, its subsidiaries and associated company (the "**Group**") as disclosed in the Company's circular dated 16 May 2012 (the "**Circular**"). The other key executive disclosed in the Circular, Mr David Wilson Thomas Newcombe, had left the Group on 25 March 2013.

BY ORDER OF THE BOARD

Anthony Brian Taylor
Executive Chairman

22 April 2013