



PERMANENT MISSION OF THE REPUBLIC OF SINGAPORE  
UNITED NATIONS | GENEVA

PERMANENT REPRESENTATIVE

19 February 2024

Mr Damilola S. Olawuyi  
Chair-Rapporteur of the Working Group on the issue of human rights and  
transnational corporations and other business enterprises

Mr Surya Deva  
Special Rapporteur on the right to development

Mr David R. Boyd  
Special Rapporteur on the issue of human rights obligations relating to the  
enjoyment of a safe, clean, healthy and sustainable environment

Mr José Francisco Cali Tzay  
Special Rapporteur on the rights of Indigenous Peoples

Dear Special Procedure Mandate Holders,

I refer to your Joint Communication dated 20 December 2023 [Ref: A: SGP 5/2023]. I take this opportunity to provide more information on the registration status of Hoch Standard Pte. Ltd. (“Hoch”) and to clarify that the Singapore Government is not involved in any discussion on the Nature Conservation Agreement (NCA) between Hoch and the Sabah State Government.

### **Registration status of Hoch**

2 All companies in Singapore that wish to carry out an activity on a continual basis for the purpose of profit must register with the Accounting and Corporate Regulatory Authority (ACRA). Based on publicly available information on ACRA, Hoch is a “live” private company limited by shares that has been incorporated since 2019.<sup>1</sup> The director of Hoch is Mr Ng Wei Cheun Benjamin. Our records show that Hoch has been compliant with the ACRA-stipulated requirements, including filing their financial statements, annual reports, conducting their Annual General Meetings (AGMs), and updating their shareholders.

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<sup>1</sup> A company with a “live” status indicates that it is currently in existence in ACRA’s records and is legally registered to operate in Singapore. The business information of entities registered with ACRA is publicly available at: <https://www.bizfile.gov.sg/>.

### **Non-involvement in commercial decisions**

3 Even though Hoch is a company that is registered in Singapore, the Singapore Government is not involved in the activities of Hoch or privy to the discussions regarding the terms and regulations of the NCA between Hoch and the Sabah State Government.

### **Singapore is committed to upholding our international obligations**

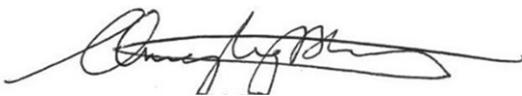
4 Singapore takes our international obligations seriously. We ensure that our laws and policies are consistent with such obligations, including those under relevant human rights instruments. The rule of law, integrity and transparency are key tenets of our governance.

5 The Singapore Government expects all Singapore companies to have responsible business practices and to comply fully with the laws of Singapore as well as the laws of the jurisdictions in which they operate. We will take appropriate action should such companies commit breaches under our laws. Singapore continually assesses how we may strengthen our framework of corporate governance, in the light of best practices and our national context.

### **Conclusion**

6 I hope the above enhances your understanding of the facts involving the signing of the NCA between Hoch and the Sabah State Government, and Singapore's position on the matter. I look forward to engaging constructively with you in areas of mutual collaboration.

Yours sincerely,



**UMEJ BHATIA**

Ambassador and Permanent Representative