

BY EMAIL

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WITHOUT PREJUDICE

Date:
17 October 2016

Our reference:
EUQ/ABC/2160005067

Your reference:
VLEOW/1016003063

Dear Sirs

**SIAC ARBITRATION NO. 83 OF 2016
OFFER TO SETTLE**

1. We refer to the above-captioned arbitration proceedings (the "Arbitration") and your letter dated 20 September 2016.
2. As your client is aware, under the Teaming Agreement dated 5 February 2015 (the "TA"), our client was granted the exclusive right to participate in the ERP2 Project via (a) the supply of consultancy services and map data, (b) the sharing of expertise and documentation and (c) the sharing of intellectual property and domain knowledge. This would have entitled our client to earn a total of S\$9.98 million.
3. Further, our client is of the view that our client's cooperation and contribution to your client's tender process played a part in your client being awarded the tender for the ERP2 Project.
4. Be that as it may, our client is genuinely interested in reaching an amicable settlement, and as a final proposal for settlement, proposes that the dispute between parties be finally resolved via the payment of S\$3.2 million from your client to our client.
5. Kindly let us know by **noon on Tuesday, 1 November 2016**, whether your client is agreeable to the above final resolution.

Yours Faithfully,



RHTLaw Taylor Wessing LLP

cc. client.

cc. Mr Foo Jong Kan (CEO)

By Email (foojk@geonav.com.sg) only

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