

## INTERESTS DISCLOSEABLE UNDER SFO AND SUBSTANTIAL SHAREHOLDERS

So far as the Directors are aware, immediately following the completion of the Share Offer, assuming the Over-allotment Option is not exercised and taking no account of the Shares which may be taken up by any person under the Share Offer and pursuant to the exercise of the Over-allotment Option which would affect disclosure in this section, the following persons will have an interest or a short position in Shares or underlying Shares which would fall to be disclosed to the Company and the Stock Exchange under the provisions of Divisions 2 and 3 of Part XV of the SFO, or, who are, directly or indirectly, interested in 10% or more of the nominal value of any class of share capital carrying rights to vote in all circumstances at general meetings of any other member of the Group:

### *Long positions in Shares*

Name	Capacity/ Nature of interest	Number of Shares	Number of Shares subject to options granted under the Pre-IPO Share Option Scheme	Approximate percentage of shareholding <i>(Note 4)</i>
Ms. Tsang	Beneficial owner/ Interest of spouse	540,000,000 <i>(Note 1)</i>	1,250,000 <i>(Note 2)</i>	75.17%
Mr. Lee Soo Ghee	Beneficial owner/ Interest of spouse	540,000,000 <i>(Note 3)</i>	1,250,000 <i>(Note 2)</i>	75.17%
Silver Compass Holdings Corp.	Beneficial owner	367,200,000 <i>(Note 1)</i>	Nil	51%
Silver Hendon Enterprises Corp.	Beneficial owner	172,800,000 <i>(Note 1)</i>	Nil	24%

### *Notes:*

- Ms. Tsang's interests in the Shares are held through Silver Compass Holdings Corp. and Silver Hendon Enterprises Corp. as both of these companies are wholly owned by Ms. Tsang.
- Ms. Tsang has been granted an option for 600,000 Shares under the Pre-IPO Share Option Scheme and Mr. Lee Soo Ghee has been granted an option for 650,000 Shares under the Pre-IPO Share Option Scheme. Mr. Lee Soo Ghee is the husband of Ms. Tsang and, for the purposes of the SFO, Mr. Lee is deemed or taken to be interested in the share options granted to Ms. Tsang under the Pre-IPO Share Option Scheme and Ms. Tsang is deemed or taken to be interested in the share options granted to Mr. Lee under the Pre-IPO Share Option Scheme.
- Mr. Lee Soo Ghee is the husband of Ms. Tsang and is deemed to be interested in the Shares in which Ms. Tsang is deemed or taken to be interested for the purpose of the SFO.
- As required under the SFO, the relevant percentages are calculated by reference only to the Shares in issue on the Listing Date and on the assumption that no Shares are issued pursuant to the exercise of the Over-allotment Option, options which have been granted under the Pre-IPO Share Option Scheme and options which may be granted under the Share Option Scheme. Consequently, this is based on 720,000,000 Shares, being the number of Shares which will be in issue on the Listing Date assuming that the Shares pursuant to the Share Offer have been issued.

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### *Short positions in Shares*

<b>Name</b>	<b>Capacity</b>	<b>Number of Shares subject to the short position</b>	<b>Approximate percentage of issued Shares (Note 2)</b>
Ms. Tsang	Corporate	30,600,000 (Note 1)	4.25%
Silver Compass Holdings Corp.	Beneficial	30,600,000 (Note 1)	4.25%
Silver Hendon Enterprises Corp.	Beneficial	30,600,000 (Note 1)	4.25%

### *Notes:*

1. These short positions are the result of: (i) the Company having issued options for 3,600,000 Shares under the Pre-IPO Share Option Scheme. Ms Tsang, through Silver Compass Holdings Corp. and Silver Hendon Enterprises Corp. (each holding 367,200,000 Shares and 172,800,000 Shares, respectively), is deemed to be interested in more than one-third of the issued share capital of the Company and (ii) Silver Hendon Enterprises Corp. having entered into the Stock Borrowing Agreement.
2. As required under the SFO, the relevant percentages are calculated by reference only to the Shares in issue on the Listing Date and assuming that no Shares are issued pursuant to the exercise of the Over-allotment Option, options which have been granted under the Pre-IPO Share Option Scheme and options which may be granted under the Share Option Scheme. Consequently, this is based on 720,000,000 Shares, being the number of Shares which will be in issue on the Listing Date assuming that the Shares pursuant to the Share Offer have been issued.

Save as disclosed herein, the Directors are not aware of any person who will, immediately following the Share Offer, have an interest or a short position in Shares or underlying Shares which would fall to be disclosed to the Company and the Stock Exchange under the provisions of Divisions 2 and 3 of Part XV of the SFO, or, be directly or indirectly interested in 10% or more of the nominal value of any class of share capital carrying rights to vote in all circumstances at general meetings of any other member of the Group and are therefore regarded as substantial shareholders of the Company under the Listing Rules.