

SUBSTANTIAL SHAREHOLDERS

As at 30th September, 2001, the register maintained by the Company under Section 16(1) of the SDI Ordinance shows that the Company has been notified of the following interests, being 10% or more of the Company's issued share capital:

Name	<i>Note</i>	No. of shares
Sino-i.com Limited	1	20,239,560,000
Victorious Limited	1	11,949,110,000
Robina Profits Limited	1	400,000,000
Ko Tact Limited	1	7,890,450,000

Note:

- Victorious Limited, Robina Profits Limited and Ko Tact Limited are wholly-owned subsidiaries of Sino-i.com Limited and Sino-i.com Limited is 52.30 per cent. beneficially owned by Mr. Yu Pun Hoi and his associates.

PURCHASE, SALE OR REDEMPTION OF LISTED SECURITIES

During the six months ended 30th September, 2001, neither the Company nor any of its subsidiaries has purchased, sold or redeemed any shares of the Company.

AUDIT COMMITTEE

The Audit Committee has reviewed with management the accounting principles and practices adopted by the Group and discussed auditing, internal controls and financial reporting matters including a review of the unaudited interim results for the six months ended 30th September, 2001.

CODE OF BEST PRACTICE

None of the Directors is aware of any information that would reasonably indicate that the Company is not, or was not for any part of the six months ended 30th September, 2001, in compliance with the Code of Best Practice as set out in Appendix 14 of the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited except that non-executive Directors are not appointed for a specific term as recommended in paragraph 7 of Appendix 14. All Directors, including the non-executive Directors, are subject to the retirement and rotation requirements in accordance with the Company's Bye-Laws.

By order of the Board

Lam Bing Kwan

Director

Hong Kong, 19th December, 2001