

**SUBSTANTIAL SHAREHOLDERS' AND OTHER PERSONS' INTERESTS AND SHORT POSITIONS IN SHARES**

The Company has been notified of the following interests in the Company's issued shares at 30 June 2004 amounting to 5% or more of the ordinary shares in issue:

Name	Capacity in which shares were held	Number of ordinary shares held	% of total issued share capital of the Company
Ocean Inc ( <i>Note 1, 2</i> )	Interests of controlled corporations	253,876,320	74.7%
Pad Inc ( <i>Note 1</i> )	Interests of controlled corporations	153,006,960	45.0%
Lapford Limited ( <i>Note 1</i> )	Interests of controlled corporations	153,006,960	45.0%
Kansas Holdings Limited ( <i>Note 1</i> )	Interests of controlled corporations	153,006,960	45.0%
Kansas Holdings Limited ( <i>Note 2</i> )	Beneficial owner	100,869,360	29.7%
Goodland Limited ( <i>Note 1</i> )	Beneficial owner	153,006,960	45.0%
Kerry Group Limited ( <i>Note 3</i> )	Interests of controlled corporations	20,325,600	6.0%
Kerry Holdings Limited ( <i>Note 3</i> )	Interests of controlled corporations	20,325,600	6.0%

*Notes:*

- (1) Ocean Inc, Pad Inc, Lapford Limited and Kansas Holdings Limited had deemed interests in the same 153,006,960 shares beneficially held by Goodland.
- (2) Ocean Inc had deemed interests in the same 100,869,360 shares beneficially held by Kansas Holdings Limited.
- (3) Kerry Holdings Limited is a wholly owned subsidiary of Kerry Group Limited and both had deemed interests in the same 20,325,600 shares held by the subsidiaries of Kerry Holdings Limited.

Save as mentioned above, at 30 June 2004, the Company had not been notified of any interests and short positions in the shares and underlying shares of the Company which had been recorded in the register required to be kept under section 336 of the SFO.

**PURCHASE, SALE OR REDEMPTION OF LISTED SECURITIES**

Neither the Company nor any of its subsidiaries purchased, sold or redeemed any of the Company's listed securities during the six months ended 30 June 2004.

**CODE OF BEST PRACTICE**

The Directors are not aware of any information that would reasonably indicate that the Company is not, or was not during the course of the six months ended 30 June 2004, in compliance with Appendix 14 of the Rules Governing the Listing of Securities on the Hong Kong Stock Exchange (the "Listing Rules"), other than that the Directors of the Company are not appointed for specific terms, as they are all subject to retirement by rotation and re-election at annual general meetings of the Company in compliance with the Articles of the Company.

The Directors have also adopted the "Model Code For Securities Transactions By Directors of Listed Issuers" as per Appendix 10 of the Listing Rules.

**Ho Kian Guan**  
Executive Chairman

Hong Kong, 8 September 2004