

**BESRA GOLD INC. - TOP 20 SECURITYHOLDERS AT 30 SEPTEMBER 2021**  
**(COMBINATION OF COMMON STOCK AND CDI SECURITYHOLDERS)**

INVESTOR NAME	SECURITIES	% I/C	RANK
PANGAEA RESOURCES LIMITED	89,951,628	30.58%	1
COLBERN FIDUCIARY NOMINEES PTY LTD	51,993,699	17.68%	2
INCOR LIMITED	13,990,983	4.76%	3
GLADIOLI ENTERPRISES SDN BHD	12,500,000	4.25%	4
FOREST NOMINEES LIMITED	11,223,664	3.82%	5
EURO PACIFIC ASSET MANAGEMENT LLC <EURO PACIFIC GOLD FUND A/C>	10,259,848	3.49%	6
GROWTH EQUITIES CORPORATION PTY LIMITED	5,082,092	1.73%	7
NUZENO HOLDINGS PTY LTD	4,356,110	1.48%	8
MR ANDREW SCHIFF <THE PDS FAMILY HYCET A/C>	3,419,949	1.16%	9
RUBI HOLDINGS PTY LTD <JOHN RUBINO SUPER FUND A/C>	3,174,603	1.08%	10
NORFOLK BLUE PTY LTD <NORFOLK BLUE A/C>	2,805,952	0.95%	11
NATIONAL NOMINEES LIMITED <DB A/C>	2,500,001	0.85%	12
MR BENJAMIN ISAAC HOAD	2,380,952	0.81%	13
MR RUI WU	1,709,974	0.58%	14
E&E HALL PTY LTD <E & E HALL P/L S/F>	2,587,303	0.88%	15
MR AU YEUNG JACKIE	1,587,302	0.54%	16
MR MICHAEL FRANK MANFORD <NO 2 A/C>	1,587,302	0.54%	17
PEARSE STREET PTY LTD	1,587,302	0.54%	18
RUNNING WATER LTD	1,043,651	0.35%	19
NASDAQ SECURITIES AUSTRALIA PTY LTD	1,000,000	0.34%	20

TOTAL SECURITIES HELD BY TOP 20 HOLDERS	224,742,315	76.41%
TOTAL SECURITIES HELD BY REMAINING HOLDERS	69,388,214	23.59%
TOTAL SECURITIES	294,130,529	100.00%