ROFINA GROUP LIMITED

(ACN 635 120 517)

UNIT 1958, LEVEL 19, 1 O'CONNELL STREET, SYDNEY, NSW 2000, AUSTRALIA.

Date: 1 July 2020

NSX Limited 1 Bligh Street Sydney NSW 2000

Attn: Mr. John Williams

Dear Sir.

RE: PROPOSED LISTING ON THE NATIONAL STOCK EXCHANGE OF AUSTRALIA

- ROFINA GROUP LIMITED (ACN 635 120 517) ("Rofina" or the "Company")

Rofina is proposing to apply for the listing of and quotation for all its ordinary fully paid up shares on the National Stock Exchange of Australia Limited.

We set out below the relevant requested information of the Company for your kind consideration:

1. General

(1) the name of the applicant and the date and place of incorporation;

Rofina Group Limited (ACN 635 120 517) is a company incorporated in Australia and registered in New South Wales on 26 July 2019.

if not incorporated in Australia, the date on which the applicant became registered under the Corporations Act;

Not applicable.

(3) the address of the principal registered office and the address of each office at which a share register is kept;

The registered office of the Company is located at Boardroom Pty Limited, Level 12, 225 George Street, Sydney, NSW 2000 where the share register is also kept.

(4) a formal request for the listing of the securities in respect of which application is made, specifying the nature of the securities and the amount, class, the voting rights attached and whether they are to be fully paid;

We formally request listing of the Company's fully paid ordinary shares

("Shares"). The total number of Shares the Company proposes to list and quote is 157,500,068 fully paid ordinary Shares. These Shares shall have the rights as prescribed by the constitution of the Company. The holders of Shares in the Company are entitled to one vote per share at any general meeting on any matter that can be voted upon by the shareholders of the Company ("Shareholders"). Shareholders have no pre-emptive or other rights to subscribe for additional Shares. Please refer to Section 13.1 (Rights attached to Shares) of the prospectus dated 1 July 2020 issued by the Company ("Prospectus") for further information on the rights attaching to the Shares.

(5) the proposed method by which the securities are to be brought to listing and details of any proposed distribution of the securities;

The proposed listing will be by way of an initial public offering under the Prospectus. There is currently no arrangement for distribution via brokers.

(6) the estimated market capitalisation of the securities for which a listing is sought;

Shares currently on issue: 143,000,068 Shares Shares offered under the Prospectus: 14,500,000 Shares Total Shares to be quoted following the offer: 157,500,068 Shares

Estimated market price per Share: \$0.10

Estimated market capitalisation: \$15,750,007.00

(7) an estimate of the net proceeds of any proposed issue and the intended use of the proceeds; and

The offer is to issue 14,500,000 Shares at an issue price of \$0.10 per share to raise \$1,450,000 in Rofina and is offered to investors identified by the directors and who have agreed to subscribe for the said Shares. The investors are not (and nor are they associated with) a director or substantial Shareholder of the Company ("Offer").

The funds raised by the Offer is intended to be used as follows:

Use of proceeds	\$	%
Working capital*	650,000	44.8
Outstanding Listing expenses	200,000	13.8
Market expansion#	200,000	13.8
Product development^	100,000	6.9
Repayment of bank borrowings	300,000	20.7
Total	1,450,000	100

Notes:

includes costs for e-commerce development and other digital marketing strategies and channels, to enhance human resource training and

^{*} includes payments to suppliers for purchase of products and expenses comprising salaries and statutory contributions and rental and utility expenses;

development in using digital tools to penetrate market segments build stronger customer base and customer retention and development of market share in East Malaysia and other tourism hotspots; and

^ includes to design and create new product lines for bags, handbags and backpacks in order to expand the product categories developed by the Group and continued efforts to develop the Group's luggage designs to keep up with market trends.

The proposed use of proceeds described above represents the Company's current intentions based on its present plans and business conditions. The amounts and timing of the actual expenditures may vary.

(8) the name of any other stock exchange on which any securities of the issuer are already listed and/or traded.

The Company's securities are not listed on any other stock exchange.

2. Share capital and ownership

- (1) A list in tabular form of:
- (i) the designation or title of each class of share;

The Company has one class of share on issue being fully paid ordinary shares.

(ii) the number of shares issued;

Please refer to Section 5.11 (Capital Structure table) of the Prospectus.

(iii) the voting rights attached to each share;

All Shares have the same voting right. Each Share has one vote. Please refer to Section 13.1 (Rights attached to Shares) of the Prospectus.

(iv) the amount of fully paid up shares;

Please refer to Section 5.11 (Capital Structure table) of the Prospectus.

(v) the shareholdings of the directors and officers of the issuer; and

Please refer to Section 8.7 (Directors' holdings) of the Prospectus.

(vi) so far as is known, or can be ascertained after reasonable enquiry, the names of all shareholders of the issuer who own five percent (5%) or more of the shares of the issuer and their respective shareholdings.

Name	Shares held currently and also at the completion of the Offer	% held currently	% at the completion of the Offer
Boon Chin Soo	36,422,168	25.47	23.13
Wei Yin Soo	14,568,868	10.19	9.25

Yeng Fong Wong	14,568,867	10.19	9.25
Yi Yun Soo	<i>7,284,4</i> 33	5.09	4.63

(2) A list in tabular form of the names of all shareholders of the issuer including the dates that the shares were allotted to them, the consideration that they provided and the number of shares that are held.

A list of Shareholders is enclosed as **Appendix 1** to this letter of application.

3. Securities

An outline of the principal terms of the securities the applicant wishes to list.

The principal terms of the Shares to be listed on the NSX are set out in Section 13.1 (Rights attached to Shares) of the Prospectus.

4. History and nature of business

A short introductory paragraph describing the general nature of the business and products of the applicant. A brief history of the issuer for the last five (5) years or, if later, from inception to the date of the application. A description of the business now conducted by the issuer and its child entities, including principal products manufactured, services performed or investments held, principal markets for products and raw materials, method of marketing, annual turnover for the preceding three (3) financial years and for the current financial year to the latest date available.

Please refer to Sections 5 (Business Overview) and 9 (Financial Information) of the Prospectus.

5. Summary of earnings

A summary of earnings, on a consolidated basis if the applicant has subsidiaries, for the last three (3) financial years, showing sales, earnings before charges for depreciation, interest and tax (if any), the amount of each of those charges, net income before extraordinary items, extraordinary items, net income and earnings per share.

Please refer to Section 9 (Financial Information) of the Prospectus.

6. Tabulation of balance sheet

A tabulation of its balance sheet for each of the last three (3) financial years (on a consolidated basis if the issuer has subsidiaries) or from the date of incorporation, if shorter. The tabulation should include a calculation of the net asset value per security for each of the three (3) financial years.

Please refer to Section 9 (Financial Information) of the Prospectus.

7. Employees

A statement as to the total number of persons regularly employed and, if subject to seasonal fluctuations, the maximum and minimum numbers employed during the preceding twelve (12) months.

The Company has 5 directors (2 executive and 3 non-executive and independent directors) and the Company's subsidiary companies being Rofina Marketing (M) Sdn Bhd, Rofina Holdings Sdn Bhd and Rofina Global Pty Ltd, employ 105 employees.

8. Child entities

A tabular list of all child entities showing in respect of each such corporation:-

- (1) the name of the corporation;
- (2) a brief statement of the nature of its business and its relationship to the operations of the entire enterprise; and
- (3) share capital by classes, showing the amount issued and the amount owned by the holding entity.

Subsidiaries Name	Nature of Business	Share capital by classes, amount issued and owned by the holding entity.
Rofina Global Pty Ltd	Is the operating business which carries on the wholesale business of luggage and bags in Australia.	The total issued and fully paid-up ordinary shares of Rofina Global Pty Ltd is \$2 consisting of 2 ordinary shares.
		The Company is the holder of 100% of the issued and fully paid-up ordinary shares of Rofina Global Pty Ltd.
Rofina Holdings Sdn Bhd	A holding company which was incorporated to hold 100% of the Malaysian operating company in conjunction with the listing exercise.	The total issued and fully paid up ordinary shares of Rofina Holdings Sdn Bhd is MYR13,000,006 consisting of 13,000,006 ordinary shares.
		The Company is the holder of 100% of the issued and fully paid-up ordinary shares of Rofina Holdings Sdn Bhd.

Subsidiaries						
Name		Natu	ire of E	Business		
Rofina		Is	the	operating		
Marketing	(M)	busi	ness w	hich carries		
Sdn Bhd		on t	he sale	of luggage		
		and	bag	s, winter		

apparel

accessories.

and

travel

Share capital by classes, amount issued and owned by the holding entity.

The total issued and fully paid-up ordinary shares of Rofina Marketing (M) Sdn Bhd is MYR13,000,000 consisting of 13,000,000 ordinary shares.

Rofina Holdings Sdn Bhd Sdn Bhd is the holder of 100% of the issued and fully paid-up ordinary shares of Rofina Marketing (M) Sdn Bhd.

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9. Dividend record

State the number of consecutive years in which dividends have been paid. State the amount of dividend (per share and in the aggregate) paid by the applicant (and its child entities) for each of the three (3) preceding years. Indicate whether dividends have been paid on a quarterly, semi-annual or annual basis. State the record date, payment date and the date of declaration with respect to each dividend paid during the past two (2) years.

Neither the Company nor any of its subsidiary companies have declared or paid any dividends since incorporation.

10. Properties

Describe briefly the general character of the properties of the applicant and its child entities, including:

- (1) location;
- (2) land area;
- (3) number of buildings;
- (4) aggregate floor area of buildings; and
- (5) whether properties are owned or leased, and if leased, state total rental paid for each of the three (3) preceding financial years and average term of years.

(A) Properties Owned

Location	Land Area (sqm)	No. of Buildings	Aggregate floor area of buildings (sqm)	Total rental paid for each 3 preceding financial years	Term
Lot No. 11684, Mukim 13, Daerah Timur Laut, Pulau Pinang held under Geran 126707 bearing assessment address of No. 22, Lebuh Rambai 11, MK 13, 11060 Paya Terubong, Pulau Pinang, Malaysia.	205.04	1 (3½ Storey)	741.55	-	-
Lot No. 11683, Mukim 13, Daerah Timur Laut, Pulau Pinang held under Geran 126706 bearing assessment address of No. 22A, Lebuh Rambai 11, MK 13, 11060 Paya Terubong, Pulau Pinang.	201.97	1 (3 ½ Storey)	730.31	-	-

Lot No. 11678, Mukim 13, Daerah Timor Laut, Pulau Pinang held under Geran 126701 bearing assessment address of No. 32A, Lebuh Rambai 11, MK 13, 11060 Paya Terubong, Pulau Pinang. Malaysia.	213.03	1 (3 ½ Storey)	769.05	-	-
Parcel No. 10C-13A-3, Island Resort, Solok Batu Ferringhi, 11100 Batu Ferringhi, Penang. Malaysia.	222.97	1	222.97	-	-
Lot 3A-G-04, Ground Floor, Kompleks Bukit Jambul, Jalan Rumbia, 11900 Bayan Lepas, Penang. Malaysia.	90.67	1	90.67	-	-

(B) Properties Leased

		No. of	Aggregate floor area of	Current Rental Term & Option	Total Rental Paid for Financial Year Ended 31 May 2018	Total Rental Paid for Financial Year Ended 31 May 2019	for Financial Year Ended 31 May 2020
Location	Land Area	Buildings	buildings (sqm)	to Renew	(AUD) ¹	(AUD) ²	(AUD) ³
6C-21-07, All Seasons Park, Autumn Tower Lebuhraya Thean Teik, 11500 Air Itam, Penang, Malaysia.	-		125.88	2 Years	6,241.72	4,562.35	8,920.35
Lot 1F - 150 & 151, Queensbay Mall, No.100, Persiaran Bayan Indah, 11900 Penang, Malaysia	-	1	<u>Lot 150</u> : 51.65	3 + 3 Years	38,616.73	39,709.36	48,849.56
			<u>Lot 151</u> : 51.00				
Lot LG — 101, Queensbay Mall, No.100 Persiaran Bayan Indah, 11900 Penang Malaysia.	-	1	55.37	2 Years	34,045.77	33,457.25	35,044.25
Lot LG – 102, Queensbay Mall, No.100 Persiaran Bayan Indah, 11900 Penang Malaysia.	-	1	55.37	2 Years	34,045.77	33,457.25	35,044.25
Lot 170-02-06, Plaza Gurney, Persiaran Gurney, 10250 Penang.	-	1	55.00	8 Months 26 Days	40,087.59	44,016.37	36,571.88
Lot 170-02-07/08, Plaza Gurney, Persiaran Gurney, 10250 Penang.	-	1	107.00	8 Months 26 Days	72,679.62	82,296.66	69,827.36
Lot 163D-3-11, Gurney Paragon Mall, Persiaran Gurney, 10250 Penang.	-	1	124.49	3 + 3 Years	81,020.11	86,948.29	98,049.90
Lot F40, Aeon Mall Bukit Mertajam, Jalan Rozhan, Alma, 14000 Bukit Mertajam, Penang.	-	1	118.45	3 + 2 Years	44,847.27	48,622.36	51,115.54

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Total Rental Paid

 $^{^{1}}$ Calculated based on the average exchange rate for the 12-month period to 31 May 2018 of MYR/AUD: 3.1722

² Calculated based on the average exchange rate for the 12-month period to 31 May 2019 of MYR/AUD: 2.9590

³ Calculated based on the average exchange rate for the 12-month period to 31 May 2017 of MYR/AUD: 3.2178

Lot G-92, Design Village Outlet Mall, 733, Jalan Cassia Barat 2, Bandar Cassia, 14110 Batu Kawan, Pulau Pinang	-	1	218.04	3 + 3 Years	80,608.33	93,277.19	97,701.66
Unit No. F-06, First Floor, Sunway Carnival Shopping Mall, 3068 Jalan Todak, Pusat Bandar, 13700 Seberang Jaya, Penang.	-	1	121.98	2 Years 8 Months 7 Days	86,889.37	95,812.86	102,788.35
Unit 2-36, 2nd Floor, Aman Central Mall, Lebuhraya Darul Aman, 05100 Alor Setar, Kedah.	-	1	192.96	3 + 3 Years	62,856.06	67,384.93	70,581.24
Lot G-12, Ground Floor, Alor Star Mall, Kawasan Perusahaan Tandop Baru, 05400 Alor Setar, Kedah.	-	1	88.72	3 Years	52,383.20	56,157.49	39,039.68
Lot F-35, 1st Floor, AEON Mall Taiping, Jalan Kamunting, 34600 Taiping, Perak Darul Ridzuan.	-	1	138.98	1 Year	64,332.12	61,903.77	47,324.45
Unit F-19, 1 st Floor, Ipoh Parade, No. 105, Jalan Sultan Abdul Jalil, Greentown,30450 Ipoh, Perak Darul Ridzuan.	-	1	133.32	2 Years	62,245.76	69,058.47	74,772.39
Lot F-11, 1st Floor, AEON Seri Manjung Shopping Centre, Pusat Perniagaan Manjung Point 3, 32040 Seri Manjung, Perak.	-	1	134.15	3 Years	43,188.64	44,526.34	46,850.00
G43 & G44 (Lot No. G-24 & G-25), Ground Floor Berjaya Times Square, No. 1 Jalan Imbi, 55100 Kuala Lumpur.	-	2	<u>Lot G-24</u> : 51.00	3 + 3 Years	67,600.70	157,132.38	164,790.97
			<u>Lot G-25</u> : 51.00				
Lot G-09, Lower Ground Floor, Empire Shopping Gallery, Jalan SS 16/1, Ss 16, 47500 Subang Jaya, Selangor, Malaysia.	-	1	39.21	3 + 2 Years	37,403.80	59,898.61	62,814.51

Lot 1-42, First Floor, Fahrenheit 88, 179 Jalan Bukit Bintang, 55100 Kuala Lumpur.	-	1	107.95	3 Years	99, 152.53	87,072.04	90,738.83
L1-34, First Floor, IOI City Mall, IOI Resort City, 62502 Putrajaya, Selangor, Malaysia.	-	1	116.22	3 + 3 Years	53,747.93	126,833.39	117,133.17
Lot L2.24 Nu Sentral, No. 201, Jalan Tun Sambathan, 50470 Kuala Lumpur.	-	1	110.18	2 Years	84,575.06	89,942.01	94,880.00
Lot G-128A, Ground Floor, 1 Utama Shopping Centre, No. 1, Lebuh Bandar Utama, Bandar Utama Damansara, 47800 Petaling Jaya, Selangor Darul Ehsan, Malaysia.	-	1	90.77	3 + 2 Years	89,624.55	101,695.17	109,977.35
Lot 4.22.00, Level 4, Pavilion Kuala Lumpur, 168 Jalan Bukit Bintang, 55100 Kuala Lumpur.	-	1	109.81	3 + 3 Years	120,270.37	204,993.24	219,749.38
Unit 1-60, First Floor, Sunway Velocity Mall, 80, Jalan Cheras, Maluri, 55100 Kuala Lumpur, Malaysia.	-	1	91.32	3 + 3 Years	62,315.56	69,912.46	73,742.83
Lot S-17, Second Floor, AEON Mall Bandaraya Melaka, No 2. Jalan Legenda Taman I-Legenda, 75400 Melaka	-	1	70.14	3 Years	25,419.72	34,915.75	36,682.58
Lot F-12, First Floor, AEON Mall Kempas, Bandar Dato' Onn, No.3, Bandar Dato Onn, Johor Bahru, Johor, Malaysia.	-	1	118.45	3+2 Years	43,504.82	64,120.83	67,363.33
Lot F-63, First Floor, AEON Mall Kulaijaya, PTD 106273, Persiaran Indahpura Utama, Bandar Indahpura, 81000 Kulaijaya, Johor.	-	1	107.02	3+2 Years	51,433.96	47,469.48	55,971.31
Lot 2F-18, Second Floor, Paradigm Mall Johor Bahru, Taman Bukit	-	1	88.91	3 + 3 Years	20,641.53	46,572.49	46,945.72
Mewah, 81200 Johor Bahru, Johor							

11. Litigation

Particulars of any litigation or claims of material importance made against any member of the group in the last five (5) years or which is pending or threatened against any member of the group, or an appropriate negative statement.

Save as set out below, neither the Company nor any of its subsidiaries is involved in any litigation or claims of material importance in the last 5 years from the date of this letter or which is pending or threatened against any member of the group:

MTrustee Berhad had on 18 June 2019 filed a suit against Rofina Marketing (M) Sdn Bhd to hold the movable property on the premises, GF-57, East Coast Mall, Ground Floor, Jalan Putra Square 6, Putra Square, 25200 Kuantan, Pahang Darul Makmur, Malaysia (the "Premises"), for the sum of RM58,973.65 being the outstanding rent due payable from March 2019 to June 2019 to the MTrustee Berhad for the Premises. Rofina Marketing (M) Sdn Bhd had on 2 July 2019 settled the outstanding rent and the Magistrate's Court of Kuantan had on 1 August 2019 withdrawn the action against Rofina Marketing (M) Sdn Bhd.

12. Management

(1) the full name, residential address and description (being his or her qualifications or area of expertise or responsibility) of every director or proposed director and any person who performs an important administrative, management or supervisory function and particulars of the principal functions performed by each of them within the group if significant to the group;

Directors

Name	Principle Function	Address
Boon Chin Soo	Executive Chairman	No. 18 Jalan Rambai 4, 11060 Paya Terubong, Pulau Pinang.
Wei Yin Soo	Executive Director, Chief Executive Officer	No. 18 Jalan Rambai 4, 11060 Paya Terubong, Pulau Pinang.
Jacky Tran Cheung	Non-Executive and Independent Director	1 View Street, Linley Point NSW 2066.
Chor Keat Ewe	Non-Executive and Independent Director	No. 27, Green Road 4 Georgetown, Malaysia.
Su Hian Tan	Non-Executive and Independent Director	Unit 75, 21 East Crescent Street, McMahons Point NSW 2060.

Please refer to Section 8.2 (Directors) of the Prospectus for information regarding the qualifications, areas of expertise and responsibilities of each director.

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Management

Name	Principle Function	Address
Yeng Fong Wong	Executive Vice- Chairman	No. 18 Jalan Rambai 4, 11060 Paya Terubong, Pulau Pinang.
Yi Yun Soo	General Manager	No. 18 Jalan Rambai 4, 11060 Paya Terubong, Pulau Pinang.
Thian Soon Ewe	Marketing Manager	No. 23, Lorong Nakhoda 2, Teluk Air Tawar, 13050 Butterworth, Pulau Pinang.

Please refer to Section 8.4 (Senior management team) of the Prospectus for information regarding the qualifications, areas of expertise and responsibilities of each member of the management team.

(2) the nature of any family relationship between the persons mentioned in (1);

Save as disclosed below, there are no other family relationships between the persons mentioned in (1):

- (i) Yeng Fong Wong is the spouse of Boon Chin Soo.
- (ii) Boon Chin Soo and Yeng Fong Wong's children are Wei Yin Soo and Yi Yun Soo.
- (3) a brief account of the business experience of each of these persons during the last five (5) years;

Please refer to Sections 8.2 (Directors) and 8.4 (Senior management team) of the Prospectus.

(4) indicate any other directorships held by each director or proposed director in any publicly listed or traded companies; and

None of the directors hold any directorships in any publicly listed or traded companies.

(5) state if any director or proposed director has, in any jurisdiction, been convicted in any criminal proceeding or has had a bankruptcy petition filed against him or her or any partnership in which he was a partner or any body corporate of which he was a director or has been sanctioned or otherwise disciplined by any self regulatory securities association of which he or she is or has been a member or any securities supervisory or regulatory body or any such event is pending.

None of the directors have, in any jurisdiction, been convicted in any criminal proceedings or has had a bankruptcy petition filed against him or her or any partnership in which he was a partner or any body corporate of which he was a director or has been sanctioned or otherwise disciplined by any self regulated

securities association of which he is or has been a member of any securities supervisory or regulatory body or any such event is pending.

13. Sponsors, bankers, etc.

(1) the names and addresses of the issuer's sponsor, financial advisers, principal bankers, nominated adviser, share registrar/transfer agent and solicitors; and

The Company will seek NSX to waive the requirement to appoint a sponsoring broker. Please refer to the Corporate Directory at the end of the Prospectus for details of the other parties.

(2) the name, address and professional qualifications of the issuer's auditors.

Please refer to the Corporate Directory at the end of the Prospectus.

14. Statement of non-compliance

A statement of any requirements of the Listing Rules which cannot be met by the applicant and detailed arguments to support any request for a waiver or modification of the normal requirements.

Other than Listing Rule 2.2 from which the Company is seeking a waiver, the Company will meet each of the requirements of the NSX Listing Rules.

15. Declaration

A declaration, stated to be to the best of the issuer's knowledge, information and belief that:

- (1) save as specified in the application letter, all the qualifications for listing set out in Chapter 3 of Section IIA of the Listing Rules have, in so far as applicable and required to be met and fulfilled prior to application, been met or fulfilled in relation to the issuer and the securities of the issuer the subject of the application;
- (2) all information required to be included in the disclosure document pursuant to Rule 4.8 and the Corporations Act will be included; and
- (3) there are no other facts bearing on the issuer's application for listing which, in the issuer's opinion, should be disclosed to the Exchange.

EXECUTED BY ROFINA GROUP LIMITED

In accordance with Section 127(1) of the Corporations Act 2001 (Cth) by:

Name: Boon Chin Soo Designation: Director Name: Wei Yin Soo Designation: Director

Appendix 1 – Shareholders List

Rofina Group Limited Holdings Report as at 29-06-2020

Investor	ld Sort Key	Name/Address 1	Name/Address 2	Name/Address 3	Name/Address 4	Name/Address 5	Name/Addre	Domicile	Postcode	DPID	Email	Fully Paid Ordinary Shares
S0011879	99721 WANG	Hui Lei Wang	Unit 514/3-7 Claremont Street	SOUTH YARRA VIC 3141				AUS	3141			296,000
S001187	14377 DU	Xue Zhen Du	No 369 Gaoxin	Guang Chen Industrial Zone	PINGHU JIAXING ZHEJIANG 314207	CHINA		CHN				1,600,000
S001187	10665 GU	Ze Kai Gu	No 56-58 Zhijiang Road	HANGZHOU ZHEJIANG 310012	CHINA			CHN				1,200,000
S001187	10509 HULU	Xiao Hulu	No 14 Group 10 Jiuling Village	Ganyu Town Tianmen City	HUBEI PROVINCE 431714	CHINA		CHN				600,000
S001187	14296 WANG	Chen Yi Wang	No 159 Huixin Street	Huimin Industry Park Jiashan	ZHEJIANG 314119	CHINA		CHN				1,600,000
S001187	14300 WANG	Cun Liang Wang	Xiao Wang Village	Cao Zhuang Xia Bei Si Town	Bi Yang District	HE NAN PROVINCE 510800	CHINA	CHN				1,600,000
S001187	14351 WANG	Ting Ting Wang	No 159 Huixin Street	Huimin Industry Park	JIASHAN ZHEJIANG 314119	CHINA		CHN				1,600,000
S0011882	28402 XIE	Wei Xie	Room 503 No 34 Building 5	Changdao Garden Zhuangqiao St	Jiangbei District Ningbo	ZHEJIANG 315000	CHINA	CHN				55,000
S0011872	23058 ZHENG	Lian Qiang Zheng	No 30 Hongfeng Village	Yanwo Town Honghu City	HUBEI PROVINCE 510860	CHINA		CHN				2,000,000
S0011870	7176 ZHUANG	Dong Wei Zhuang	Shantou Kangrui Industrial Co	Ltd East Pu Trade City	Shantou City Street Xiashan	GUANG DONG PROVINCE	CHINA	CHN				600,000
S001187	10436 LANCAS	TEF Lancaster	422 Rue Saint-Honore	PARIS 75008	FRANCE			FRA				1,200,000
S0011879	9593 RAVIZZA	Davide Ravizza	16 Rue Saint Sabin	PARIS 75011	FRANCE			FRA				200,000
S0011882	28429 ABDULLA	AH Siti Hajjar Ummi Atikah	Binti W Abdullah	No 405 Block G18	Wangsamaju 53300	KUALA LUMPUR	MALAYSIA	MYS				10,000
S0011870	05301 ANG	Boon Huat Ang	1-09-07 Treasure Ville	Lintang Thean Teik	Bandar Baru Ayer Itam 11500	PULAU PINANG	MALAYSIA	MYS				1,050,000
S0011882	28313 BAKAR	Shahzemi Bin Abu Bakar	4924 Permatang Berangan	Tasek Gelugor 13300	PULAU PINANG	MALAYSIA		MYS				2,000
S0011882	28178 CHANG	Lok Men Chang	No 47 Jalan Rakan 4	Taman Rakan Kajang 43000	SELANGOR	MALAYSIA		MYS				10,000
S0011879	99658 CHEAH	Ewe Chuan Cheah	32-C Gat Lebuh Presgrave	Georgetown 10300	PULAU PINANG	MALAYSIA		MYS				5,000
S0011882	28097 CHEAH	Ker Sin Cheah	C-257 Taman Wira Mergong	ALOR SETAR 05350 KEDAH	MALAYSIA			MYS				10,000
S0011882	28208 CHEAH	Ning Sin Cheah	C-257 Taman Wira Mergong	ALOR SETAR 05350 KEDAH	MALAYSIA			MYS				5,000
S0011878	35762 CHEE	Ban Ho Chee	2a-03-13 Medan Angsana Satu	Ayer Itam 11500	PULAU PINANG	MALAYSIA		MYS				15,000
S0011879	99518 CHOO	Chin Pei Choo	No 1875 Jalan Bukit Tengah	Taman Indah Bukit Mertajam	14000 PULAU PINANG	MALAYSIA		MYS				400,000
S001187	14326 CHUA	Say Chai Chua	No 34 Lorong Seri Kuantan 79	25250 KUANTAN PAHANG	MALAYSIA			MYS				1,645,000
S001187	14334 CHUA	Say Hand Chua	No 34 Lorong Seri Kuantan 79	25250 KUANTAN PAHANG	MALAYSIA			MYS				1,645,000
S0011882	28194 CHUA	Sook Ching Chua	Tower Ii-7-D Greenlane Park	Solok Tembaga	11600 PULAU PINANG	MALAYSIA		MYS				200,000
S0011879	99682 CHUAH	Guat Na Chuah	9 Lorong Cengkeh 9	Taman Cengkeh Sungai Puyu	Butterworth 13020	PULAU PINANG	MALAYSIA	MYS				120,000
S0011882	28259 CHUAH	Poh Hua Chuah	26 Lintang Selayang Indah	Butterworth 13020	PULAU PINANG	MALAYSIA		MYS				160,000
S0011878	35703 ENG	Ah Chu Eng	B-5-11 Saujana Heights	Jalan Teluk Kumbar	Bayan Lepas 11920	PULAU PINANG	MALAYSIA	MYS				400,000
S0011810	3009 EWE	Thian Soon Ewe	No 23 Lorong Nakhoda 2	Teluk Air Tawew	13050 Butterworth	PULAU PINANG	MALAYSIA	MYS				486,066
S0011882	28186 FOO	Moh Hock Foo	33 Lorong Sungai Kelian	Tanjong Bungah 11200	PULAU PINANG	MALAYSIA		MYS				80,000
S0011872	23619 FOONG	Wai Fong Foong	30-A Lebuhraya Scott 10350	PULAU PINANG	MALAYSIA			MYS				2,027,000
S0011882	28381 GOH	Sahreesh Siew Kee Goh	1062-7-46 Jalan Paya Terubong	Ayer Itam 11060	PULAU PINANG	MALAYSIA		MYS				8,000
S0011882	28224 GOH	Su Liang Goh	33 Jalan Aman Teluk Air Tawar	Butterworth	13050 PULAU PINANG	MALAYSIA		MYS				80,000
S0011978	88137 GOO	Mabel Goo	No 25 JLN Inang 14/9	Bandar Mahkota Cheras	43200 CHERAS KUALA LUMPUR	MALAYSIA		MYS				55,000
S0011882	28399 HAKIM	Siti Amirah Binti Abdul Haki	m No 40 Blok P Rumah Pangsa	Taman Keramat 54200	KUALA LUMPUR	MALAYSIA		MYS				5,000
S0011882	28241 HIAH	Pier-Yuah Hiah	36 PSN Seksyen 3/10	Bandar Putera Bertam	Kepala Batas 13200	PULAU PINANG	MALAYSIA	MYS				246,600
S0011882	28160 HNG	Soo Peng H'Ng	18 Lebuh Rambai 14	Paya Terubong	Ayer Itam	11060 PULAU PINANG	MALAYSIA	MYS				80,000
S0011879	99674 KHOO	Goay Eng Khoo	1-09-07 Treasure Ville	Lintang Thean Teik	11500 Ayer Itam	PULAU PINANG	MALAYSIA	MYS				70,066
S0011879	99712 KHOO	Hoey Yen Khoo	01-01-01 PSN Sungai Nipah	Desa Indah Balik Pulau 11000	PULAU PINANG	MALAYSIA		MYS				5,000

S00118723589	KHOR	Siew Jiun Khor	315 Kampung Juru	Bukit Mertaiam 14000	PULAU PINANG	MALAYSIA		MYS	3.640.000
S00118710495	KHOR	Wooi Khean Khor	25 Solok Nangka 2	Taman Desa Damai	Bukit Mertajam 14000	PULAU PINANG	MALAYSIA	MYS	1.050.000
S00118828500	KONG	Zhen Yi Kong	394-C Lorong Taman Cantik 2	Air Itam 11500	PULAU PINANG	MALAYSIA		MYS	80,000
S00118799551	LEE	Ching Hao Lee	39 Batu 5 Simpang Empat	ALOR SETAR 06650 KEDAH	MALAYSIA			MYS	5.000
S00118799569	LEE	Chun Sean Lee	1 Lorona Tembusu 4	Taman Cengkeh Butterworth	13020 PULAU PINANG	MALAYSIA		MYS	160,000
S00118799739	LEE	Jin Yee Lee	No 170 Jalan Bunga Kertas 5	Taman Sri Muhibbah Kulaijaya	81000 JOHOR	MALAYSIA		MYS	2,000
S00118722311	LEE	Kah Wei Lee	78-16-3 Marina Bay Kondominium	Jalan Tanjung Tokong	Georgetown 10470	PULAU PINANG	MALAYSIA	MYS	2.300.000
S00118828151	LEE	Lian Ping Lee	2A Jalan Bunga Rampai	Taman Pandan Butterworth	13400 PULAU PINANG	MALAYSIA		MYS	40,000
S00118710444	LEE	Lor See Lee	59 Jalan Putra	ALOR SETAR 05100 KEDAH	MALAYSIA			MYS	1.050.000
S00118828143	LEE	Soo Chuang Lee	No 1617 JLN Tan Sai Gin	Bukit Mertajam	14000 PULAU PINANG	MALAYSIA		MYS	5.000
S00118706480	LEW	Chiew Sun Lew	26b-21-7 Zan Pavillion	Lintang Sungai Ara 6	Bayan Lepas 11900	PULAU PINANG	MALAYSIA	MYS	1.050.000
S00118710452	LIANG	Poh Ling Liang	472-A Jalan Air Itam	Ayer Itam 11400	PULAU PINANG	MALAYSIA		MYS	1,000,000
S00118799577	LIM	Chye Keat Lim	Blok 9-7-2 Taman Sri Angsana	Lebuh Relau 3 Bayan Lepas	11900 PULAU PINANG	MALAYSIA		MYS	5.000
S00118714318	LIM	Huck Leng Lim	2A Lorong Suajana Permai 4	Taman Saujana Permai	14000 Bukit Mertajam	PULAU PINANG	MALAYSIA	MYS	1,645,000
S00118723601	LIM	Soon Peng Lim	5 Lorong Titi Panjang 14	Desa Titi Panjang	Bukit Mertajam 14000	PULAU PINANG	MALAYSIA	MYS	2,400,000
S00118710487	LIM	Tjun Wei Lim	5 Lorong Titi Panjang 14	Desa Titi Panjang	Bukit Mertajam 14000	PULAU PINANG	MALAYSIA	MYS	1,000,000
S00118828330	LIM	Tsu Qi Lim	Blok 11-7-4 Taman Sri Damai	Lebuhraya Batu Lanchang	Georgetown	11600 PULAU PINANG	MALAYSIA	MYS	10,000
S00118785878	LIP	Chew Yean Lip	24 Lorong Sembilang 3	Seberang Jaya 13700	PULAU PINANG	MALAYSIA		MYS	2,000
S00118785738	LOH	Ai Leng Loh	No 2F Lintang Paya Terubong 4	Ayer Itam 11060	PULAU PINANG	MALAYSIA		MYS	400,000
S00118799640	LYE	Eric Jin Wu Lye	Blok 11-4-12b Lengkok Nipah	Sungai Dua Bayan Lepas 11900	PULAU PINANG	MALAYSIA		MYS	10,000
S00118828437	MOEY	Yik Yien Moey	E1-12-05 Lorong Gangsa	Green Lane Heights	11600 PULAU PINANG	MALAYSIA		MYS	15,000
S00118828275	MUNNSAN	/IY Punitha A/P Munnsamy	No 9 Taman Sungai Wang	Ayer Tawar 32400	PERAK	MALAYSIA		MYS	2,000
S00118709977	NEOH	Kee Peow Neoh	16 Lorong Santuari 9	Taman Santuari Alma	Simpang Ampat 14000	PULAU PINANG	MALAYSIA	MYS	800,000
S00118785789	NG	Boon Chein Ng	9-3-6 TKT Paya Terubong 2	Paya Terubong Ayer Itam 11060	PULAU PINANG	MALAYSIA		MYS	8,000
S00118710517	NG	Yew Chang Ng	1G Casa Grande	Jalan Brook 10400	PULAU PINANG	MALAYSIA		MYS	1,200,000
S00118799542	ONG	Chin Teong Ong	19-4-9 Jalan Kampar	10460 Georgetown	PULAU PINANG	MALAYSIA		MYS	264,000
S00118721985	ONG	Choon Heng Ong	1067 Jalan Besar	Permatang Tinggi 14000	Bukit Mertajam	PULAU PINANG	MALAYSIA	MYS	7,000,000
S00118799585	ONG	David Hock Lai Ong	No 20-G Gottlies Road 10	Georgetown 10350	PULAU PINANG	MALAYSIA		MYS	5,000
S00118828496	ONG	Zhen Han Ong	No 76 Jalan Bayan Kecil	Taman Nobong Tebal	Nibong Tebal 14300	PULAU PINANG	MALAYSIA	MYS	126,000
S00119787998	001	Kwang Cher Ooi	10 Pesara Lembah Permai 1	11200 Tanjung Bungah	PULAU PINANG	MALAYSIA		MYS	55,000
S00118714342	001	See Tee Ooi	60-J Jalan Matang Kucing	Ayer Itam 11500	PULAU PINANG	MALAYSIA		MYS	2,000,000
S00118828321	001	Shun Tze Ooi	26 Lintang Selayang Indah	Taman Selayang Indah	Butterworth 13020	PULAU PINANG	MALAYSIA	MYS	40,000
S00118828348	001	Shun Yun Ooi	26 Lintang Selayang Indah	Taman Selayang Indah	Butterworth 13020	PULAU PINANG	MALAYSIA	MYS	120,000
S00118710860	001	Zong Qian Ooi	26 Lintang Selayang Indah	Taman Selayang Indah	Butterworth 13020	PULAU PINANG	MALAYSIA	MYS	527,000
S00118828518	001	Zong Zie Ooi	26 Lintang Selayang Indah	Taman Selayang	Butterworth 13020	PULAU PINANG	MALAYSIA	MYS	40,000
S00118828283	PAUZI	Syaidatulnabila Binti Ahmad	Pauzi	No 29 Lorong Mewah 25	Taman Mewah Kamunting	34600 PERAK	MALAYSIA	MYS	5,000
S00118828216	SALIM	Nor Hasmira Binti Md Salim	No 3 Jalan Teluk Batik	Kg Teluk Muroh Lumut	32200 PERAK	MALAYSIA		MYS	5,000
S00118828232	SHAPIE	Nurul Fatehah Binti Mohd	Shapie	No 13A Blok C Lengkok Abdullah	BANGSAR 59000 KUALA LUMPUR	MALAYSIA		MYS	2,000
S00118828411	SIAU	Yee Vui Siau	Kamoung Gum-Gum	Batu 18 Jalan Labuk	Sandakan	90000 SABAH	MALAYSIA	MYS	5,000
S00118102959	S00	Boon Chin Soo	18 JLN Rambai 4	Paya Terubong	PENANG 11060	MALAYSIA		MYS	36,422,168

S00118785801	soo	Boon Eng Soo	60-J Jalan Matang Kucing	Aver Itam 11500	PULAU PINANG	MALAYSIA		MYS	200,000
S00118785835	S00	Boon Huat Soo	8j-05-06 Lebuhraya Thean Teik	Bandar Baru Ayer Itam 11500	PULAU PINANG	MALAYSIA		MYS	131,250
S00118102967	S00	Wei Yin Soo	18 JLN Rambai 4	Paya Terubong	PENANG 11060	MALAYSIA		MYS	14,568,868
S00118103025	S00	Yi Yun Soo	18 JLN Rambai 4	11060 Paya Terubong	PULAU PINANG	MALAYSIA		MYS	7,284,433
S00118828470	S00	Yuan Li Soo	1-P Jalan Zoo Bandar Baru	Ayer Itam 11500	PULAU PINANG	MALAYSIA		MYS	393,750
S00118785924	TAN	Agnes Siew Ling Tan	Blok H-11-9 Rumah Pangsa	Padang Tembak Ayer Itam 11400	PULAU PINANG	MALAYSIA		MYS	20,000
S00118785711	TAN	Ah Swee Tan	5 Lorong Selayang 1	Taman Selayang Sungai Puyu	Butterworth 13020	PULAU PINANG	MALAYSIA	MYS	40,000
S00119788081	TAN	Bee Leh Tan	No 36 Pintasan Kenari	Desaria Sungai Ara 11900	BAYAN LEPAS PULAU PINANG	MALAYSIA		MYS	5,360,000
S00118785771	TAN	Boon Boon Tan	50b-02-01 Persiaran Minden	Satu U-Garden Gelugor 11700	PULAU PINANG	MALAYSIA		MYS	120,000
S00118785886	TAN	Chia Wing Tan	No 187 Jalan Murni	Taman Desa Murni Sungai Dua	Butterworth 13800	PULAU PINANG	MALAYSIA	MYS	2,000
S00118785908	TAN	Chin Boon Tan	309 Jalan Khoo Hye Keat	11500 Ayer Itam	PULAU PINANG	MALAYSIA		MYS	264,000
S00118799615	TAN	Ean Ting Tan	No 128-J Happy Valley	Ayer Itam 11500	PULAU PINANG	MALAYSIA		MYS	5,000
S00118799631	TAN	Eng Keat Tan	9-9-03 Lengkok Angsana	Sri Impian Ayer Itam 11500	PULAU PINANG	MALAYSIA		MYS	20,000
S00118723597	TAN	Sin Khoon Tan	9 Jalan Bunga Cempa Putih	11200 Tanjung Bungah	PULAU PINANG	MALAYSIA		MYS	7,000,000
S00118828372	TAN	Wei Kean Tan	29 Lorong Panchor Indah 5	Taman Pancur Permai Nibong Teb	14300 PULAU PINANG	MALAYSIA		MYS	20,000
S00118828356	TEH	V-Vean Teh	422-6-1 Jalan Hill Railway	Taman Bukit Bendera Ayer Itam	11500 PULAU PINANG	MALAYSIA		MYS	40,000
S00118799666	TENG	Gaik Looi Teng	19 Lintang Bunga Rampai	Taman Pandan Butterworth	13000 PULAU PINANG	MALAYSIA		MYS	80,000
S00118785860	TEOH	Chai Ching Teoh	2067 Tingtak 1 Jalan Susur	Taman Pearl Berapit	Bukit Mertajam 14000	PULAU PINANG	MALAYSIA	MYS	50,000
S00118828461	TEOH	Yong Ning Teoh	811 Jalan Balik Pulau	Ayer Itam 11500	PULAU PINANG	MALAYSIA		MYS	10,000
S00118828267	THEAN	Suee Yee Thean	No 13 Solok Pulai 6	Taman Pulai Raya	Simpang Pulai	31300 PERAK	MALAYSIA	MYS	5,000
S00118799607	VOSSE	Dillan De Vosse	2U Jalan Ru Dua	Bandar Baru Air Itam	11500 PULAU PINANG	MALAYSIA		MYS	80,000
S00118799704	WONG	Hoay Theng Wong	9-3-18 Lintang Paya	Terubong 3 Ayer Itam 11060	PULAU PINANG	MALAYSIA		MYS	65,000
S00118828089	WONG	Kai Seng Wong	5 Lorong Seri Arowana 4	Perai 13700	PULAU PINANG	MALAYSIA		MYS	120,000
S00118103017	WONG	Yeng Fong Wong	No 18 JLN Rambai 4	11060 Paya Terubong	PULAU PINANG	MALAYSIA		MYS	14,568,867
S00118828453	WONG	Ying Pheng Wong	8c-17-19 Asia Heights	Lorong Semarak Api 3	Bandar Baru Ayer Itam	11500 PULAU PINANG	MALAYSIA	MYS	120,000
S00118721977	WOOI	Boon Leng Wooi	119 Lengkok Siakap 3	Seberang Jaya Perai 13700	PULAU PINANG	MALAYSIA		MYS	2,116,000
S00118785916	YEOH	Chin Eong Yeoh	826 MK13 Relau	Bayan Lepas 11900	PULAU PINANG	MALAYSIA		MYS	10,000
S00118722001	YEOH	Hui Oon Yeoh	8 Lebuhraya Maktab	Georgetown 10250	PULAU PINANG	MALAYSIA		MYS	3,297,000
S00118828119	YEOH	Kheng Hoe Yeoh	Blok 17-G-8	Taman Terubong Jaya	Paya Terubong Ayer Itam	11060 PULAU PINANG	MALAYSIA	MYS	264,000
S00118828135	YEOH	Lean Chet Yeoh	3-A-26-1 Arte S	Persiaran Bukit Gambir	Gelugor 11700	PULAU PINANG	MALAYSIA	MYS	5,000
S00118710461	YEOH	Teng Wei Yeoh	8 Lebuhraya Maktab	Georgetown 10250	PULAU PINANG	MALAYSIA		MYS	869,000
S00118799534	YEW	Chin Pei Yew	Blok 1-13-02 Solok Angsana Ixo	Bandar Baru Ayer Itam 11500	PULAU PINANG	MALAYSIA		MYS	5,000

Fully Paid Ordinary Shares 110 143,000,068.