

---

**THIS CIRCULAR IS SOLELY FOR YOUR INFORMATION AND  
YOU ARE ADVISED TO READ AND NOTE THE CONTENTS OF THIS CIRCULAR**

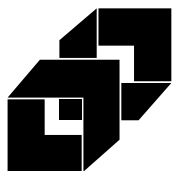
---

**If you are in any doubt** as to any aspect of this circular, you should consult your stockbroker or other registered dealer in securities, bank manager, solicitor, professional accountant or other professional adviser.

**If you have sold or transferred** all your shares or warrants in S E A Holdings Limited, you should at once hand this circular to the purchaser or transferee or to the bank, stockbroker or other agent through whom the sale was effected for transmission to the purchaser or transferee.

The Stock Exchange of Hong Kong Limited takes no responsibility for the contents of this circular, makes no representation as to its accuracy or completeness and expressly disclaims any liability whatsoever for any loss howsoever arising from or in reliance on the whole or any part of the contents of this circular.

---



**S E A H O L D I N G S L I M I T E D**

**爪哇控股有限公司\***

*(Incorporated in Bermuda with limited liability)*

(Stock Code: 251)

**DISCLOSEABLE TRANSACTIONS  
RELATING TO THE DISPOSALS OF  
BROOKFIELDS HOUSE, SIMPSON GRIERSON BUILDING,  
THE FINANCE CARPARK AND QANTAS HOUSE, AUCKLAND  
BY TRANS TASMAN PROPERTIES LIMITED**

---

A letter from the board of directors of S E A Holdings Limited is set out on pages 3 to 8 of this circular.

\* *For identification purpose only*

23rd December, 2004

---

# CONTENTS

---

	<i>Page</i>
<b>Definitions</b> .....	1
<b>Letter from the Board</b> .....	3
<b>Appendix — General Information</b> .....	9

---

## DEFINITIONS

---

*In this circular, the following expressions have the following meanings unless the context requires otherwise:*

“Agreement 1”	the sale and purchase agreement for the sale and purchase of Property 1 dated 1st December, 2004 entered into between (i) NZGP and (ii) Purchaser 1;
“Agreement 2”	the sale and purchase agreement for the sale and purchase of Property 2 dated 1st December, 2004 entered into between (i) NZGP and (ii) Purchaser 2;
“associate” or “associates”	has the same meaning as defined in the Listing Rules;
“Board”	the Board of Directors of the Company;
“Company” or “SEA”	S E A Holdings Limited, a company incorporated in Bermuda with limited liability, whose shares and warrants are listed on HKSE;
“Directors”	directors of the Company;
“Group”	the Company and its subsidiaries;
“HK\$”	Hong Kong dollars;
“HKSE”	the Stock Exchange of Hong Kong Limited;
“Latest Practicable Date”	20th December, 2004 being the latest practicable date prior to the printing of this circular for ascertaining certain information contained in this circular;
“Listing Rules”	the Rules Governing the Listing of Securities on HKSE;
“NZ\$”	New Zealand dollars;
“NZGP”	NZGP (Northern Region) Limited, a wholly-owned subsidiary of TTP and is a property development company;
“NZX”	New Zealand Exchange Limited;
“Property 1”	The properties consist of Brookfields House, Victoria Street, Simpson Grierson Building, Albert Street and the Finance Carpark, Durham Lane, Auckland, New Zealand;

---

## DEFINITIONS

---

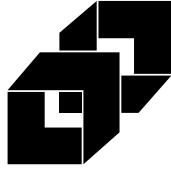
“Property 2”	Qantas House, 191 Queen Street, Auckland, New Zealand;
“Purchaser 1”	FIDK Trustco Limited, an independent third party whose principal business is property investment and development;
“Purchaser 2”	Vaduz Holdings Limited, an independent third party who is a passive property investor;
“SEA Group” or “Group”	the Company and its subsidiaries;
“SFO”	Securities and Futures Ordinance (Chapter 571 of the Laws of Hong Kong);
“Share” or “Shares”	ordinary share(s) of HK\$0.10 each in the issued share capital of the Company;
“Shareholders”	shareholders of the Company;
“TTP”	Trans Tasman Properties Limited, a company incorporated in New Zealand with limited liability, whose shares are listed on the NZX;
“TTP Board”	the Board of Directors of TTP;
“TTP Group”	TTP and its subsidiaries;
“Vendor”	NZGP.

*Note:* For the purposes of the Company’s announcement dated 1st December, 2004, and in this circular, unless stated otherwise, an exchange rate of NZ\$1.00 = HK\$5.5518 has been used. The exchange rate as at the close of business on the Latest Practicable Date was NZ\$1.00 = HK\$5.5805, calculated by taking the average of the buy and sell rates quoted on the South China Morning Post.

---

LETTER FROM THE BOARD

---



SEA HOLDINGS LIMITED

爪哇控股有限公司\*

(Incorporated in Bermuda with limited liability)

(Stock Code: 251)

*Executive Directors:*

Lu Wing Chi (*Chairman and Managing Director*)

Tse Man Bun

Lu Wing Yuk, Andrew

Lu Wing Lin

Lincoln Lu

Lambert Lu

*Non-Executive Director:*

Lu Yong Lee

*Independent Non-Executive Directors:*

Walujo Santoso, Wally

Leung Hok Lim

Chung Pui Lam

*Registered Office:*

Clarendon House

Church Street

Hamilton HM11

Bermuda

*Principal Office:*

26th Floor

Dah Sing Financial Centre

108 Gloucester Road

Wanchai

Hong Kong

23rd December, 2004

*To the Shareholders, Warrantholders and  
the holders of share options granted under  
the Company's employees share option  
scheme adopted on 23rd June, 2000.*

Dear Sir or Madam,

**DISCLOSEABLE TRANSACTIONS  
RELATING TO THE DISPOSALS OF  
BROOKFIELDS HOUSE, SIMPSON GRIERSON BUILDING,  
THE FINANCE CARPARK AND QANTAS HOUSE, AUCKLAND  
BY TRANS TASMAN PROPERTIES LIMITED**

**1. INTRODUCTION**

By an announcement dated 1st December, 2004, the Company announced that it has been advised by TTP that on 1st December, 2004:

- (i) a wholly-owned subsidiary of TTP has entered into the Agreement 1 for the sale of Property 1 to Purchaser 1.

\* For identification purpose only

---

## LETTER FROM THE BOARD

---

- (ii) a wholly-owned subsidiary of TTP has entered into the Agreement 2 for the sale of Property 2 to Purchaser 2.

TTP is a 61.31% subsidiary of the Company.

As the size tests represent more than 5% but less than 25%, each disposal constitutes a discloseable transaction of the Company under Chapter 14 of the Listing Rules.

The purpose of this circular is to give you further details of the disposals and other information prescribed by the Listing Rules.

### 2. DETAILS OF DISPOSAL 1

**Date of Agreement 1:** 1st December, 2004.

**Purchaser 1:** FIDK Trustco Limited.

**Vendor:** NZGP.

**Particulars of the assets being disposed:** Property 1 consists of Brookfields House, Victoria Street, Simpson Grierson Building, Albert Street and the Finance Carpark, Durham Lane, Auckland, New Zealand.

**Aggregate Consideration:** NZ\$58.0 million (HK\$322.0 million).

A deposit by way of transferring a property in Herne Bay at NZ\$4.8 million (HK\$26.7 million), in consultation with independent valuer, from Purchaser 1 to the Vendor.

The balance of the consideration shall be paid on Settlement Date either (a) in cash in one sum or (b) partly settled by transferring the following properties:

- (i) a section in Gulf Harbour for NZ\$1.5 million (HK\$8.3 million), in consultation with independent valuer;
- (ii) 11 lifestyle blocks in Canterbury for NZ\$10.3 million (HK\$57.2 million), in consultation with independent valuer,

and the remaining NZ\$41.4 million (HK\$229.8 million) shall be in cash.

---

## LETTER FROM THE BOARD

---

The above properties involved did not generate any rental income for the past two years.

**Settlement Date:** On or before 1st April, 2005.

**Other Material Terms:**

- (1) Property 1 will be sold unencumbered subject to tenancies.
- (2) Purchaser 1 shall within 12 months following the Settlement Date upon written request from the Vendor purchase back from the Vendor the property at Gulf Harbour at NZ\$1.5 million (HK\$8.3 million).

The consideration for the disposal of Property 1 was arrived at after arm's length negotiation between TTP and Purchaser 1. The valuation of Property 1 performed by an independent valuer as at 31st December, 2003 was NZ\$63.0 million (HK\$349.8 million) and its book value as at 31st December, 2003 was NZ\$62.7 million (HK\$348.1 million). After deducting related costs and expenditures, the Group expects to realize a net loss from the disposal of approximately HK\$19.1 million. However, based on the present market condition, the TTP Board considers that the consideration is fair and reasonable and the disposal is in the interests of its shareholders. The Board concurs with the views of the TTP Board and considers that the disposal is in the interests of the Group and its shareholders as a whole. The properties transferred from Purchaser 1 will be considered as trade properties and will be disposed in due course.

### 3. FINANCIAL EFFECTS OF DISPOSAL 1 ON THE SEA GROUP

The Group expects to realize a net loss from the disposal of approximately HK\$19.1 million.

Unaudited net operating profit after deducting operating expenses and finance costs derived from the Property 1 were NZ\$3.6 million (HK\$20.0 million) and NZ\$3.2 million (HK\$17.8 million) for the two financial years ended 31st December, 2002 and 31st December, 2003 respectively, whereas, the Group's audited consolidated loss before tax for the year ended 31st December, 2002 was HK\$316.16 million and consolidated profit before tax for the year ended 31st December, 2003 was HK\$308.61 million. Property 1 represents approximately 5.1% of the consolidated total assets as at 31st December, 2003 of the Group.

---

## LETTER FROM THE BOARD

---

### 4. DETAILS OF DISPOSAL 2

**Date of Agreement 2:** 1st December, 2004.

**Purchaser 2:** Vaduz Holdings Limited.

**Vendor:** NZGP.

**Particulars of the assets being disposed:** Property 2 known as Qantas House, 191 Queen Street, Auckland, New Zealand.

**Aggregate Consideration:** NZ\$42.0 million (HK\$233.2 million). Deposit of NZ\$1.0 million (HK\$5.6 million) in cash was paid. The balance of the consideration shall be paid on Settlement Date.

**Settlement Date:** On or before 30th January, 2005.

**Other Material Terms:**

- (1) Property 2 will be sold unencumbered subject to tenancies.
- (2) The Vendor shall give a rental guarantee up to a maximum amount of NZ\$0.9 million (HK\$5.0 million).

The consideration for the disposal of Property 2 was arrived at after arm's length negotiation between TTP and Purchaser 2. The valuation of Property 2 performed by an independent valuer as at 31st December, 2003 was NZ\$41.0 million (HK\$227.6 million) and its book value as at 31st December, 2003 was NZ\$40.8 million (HK\$226.5 million). After deducting related costs and expenditures, the Group expects to realize a net profit from the disposal of approximately HK\$4.9 million. Based on the present market condition, the TTP Board considers that the consideration is fair and reasonable and the disposal is in the interests of its shareholders. The Board concurs with the views of the TTP Board and considers that the disposal is in the interests of the Group and its shareholders as a whole.



---

## LETTER FROM THE BOARD

---

### 5. FINANCIAL EFFECTS OF DISPOSAL 2 ON THE SEA GROUP

The Group expects to realize a net profit from the disposal of approximately HK\$4.9 million.

Unaudited net operating profit after deducting operating expenses and finance costs derived from Property 2 were NZ\$0.8 million (HK\$4.4 million) and NZ\$1.7 million (HK\$9.4 million) for the two financial years ended 31st December, 2002 and 31st December, 2003 respectively, whereas, the Group's audited consolidated loss before tax for the year ended 31st December, 2002 was HK\$316.16 million and consolidated profit before tax for the year ended 31st December, 2003 was HK\$308.61 million. Property 2 represents approximately 3.3% of the consolidated total assets as at 31st December, 2003 of the Group.

### 6. REASONS FOR THE DISPOSALS

The TTP Board considers that both disposals are consistent with the TTP Group's counter-cyclical strategy of, where appropriate, disposing of mature assets in New Zealand and Australia, whose property markets are near the top of their cycles. The Board concurs with the views of the TTP Board.

### 7. USE OF PROCEEDS

Part of the proceeds of disposal 1 and disposal 2 will be used by the TTP Board to repay bank loans of NZ\$28.4 million (HK\$157.7 million) and NZ\$18.5 million (HK\$102.7 million) respectively and the remaining proceeds will be used for internal working capital.

### 8. INFORMATION ABOUT THE COMPANY

The Company is an investment holding company listed on HKSE. The activities of its principal subsidiaries are investment holding, property and asset management, garment manufacturing and trading and property investment and development in Australia, China, Hong Kong and New Zealand.

For the year ended 31st December, 2003, the audited consolidated turnover, audited net profit (loss) before taxation and audited net profit (loss) after taxation and minority interests of the Company were HK\$592.9 million, HK\$308.6 million and HK\$187.3 million respectively. The restated comparative figures due to adoption of new SSAP 12 for the year ended 31st December, 2002 were HK\$741.5 million, (HK\$316.2 million) and (HK\$202.6 million) respectively. As at 30th June, 2004, the Company's equity attributable to shareholders was stated at HK\$2,639.5 million.

---

## LETTER FROM THE BOARD

---

### 9. GENERAL

To the best of the Directors' knowledge, information and belief having made all reasonable enquiries, Purchaser 1 and Purchaser 2 and their ultimate beneficial owners are independent third parties and not connected with or related to the Company or any of its subsidiaries or connected persons or any of their respective associates.

Your attention is drawn to the appendix to this circular which contains certain additional information in relation to the Company.

Yours faithfully  
For and on behalf of  
**S E A HOLDINGS LIMITED**  
**Lu Wing Chi**  
*Chairman and Managing Director*

## 1. RESPONSIBILITY STATEMENT

This circular includes particulars given in compliance with the Listing Rules for the purpose of giving information with regard to the Company. The Directors collectively and individually accept full responsibility for the accuracy of the information contained in this circular and confirm, having made all reasonable enquiries, that to the best of their knowledge and belief there are no other facts the omission of which would make any statement in this circular misleading.

## 2. DIRECTORS' DISCLOSURE OF INTERESTS

As at the Latest Practicable Date, the interests and short positions of the Directors and the chief executives of the Company in the shares, underlying shares and debentures of the Company or any of its associated corporations (within the meaning of Part XV of the SFO) as recorded in the register required to be kept under Section 352 of the SFO, or as otherwise notified to the Company and the HKSE pursuant to the Model Code for Securities Transactions by Directors of Listed Companies, were as follows:

### 2.1 Long positions in shares and underlying shares of the Company

Name of Director	No. of Shares		Number of underlying shares (warrants)		Number of underlying shares (share option)	Total	% of shares in issue
	Interests held		Interests held				
	Beneficial interests	by controlled corporation	Beneficial interests	by controlled corporation			
Tse Man Bun	100,000	—	—	—	—	100,000	0.02
Lu Wing Yuk, Andrew	—	—	—	—	3,000,000	3,000,000	0.59
Lu Wing Chi	—	—	—	—	12,500,000	12,500,000	2.44
Lu Wing Lin	94,000	—	—	—	12,500,000	12,594,000	2.46
Lincoln Lu	618,000	260,843,811	572,717	73,897,812	—	335,932,340*	65.67
Lambert Lu	610,000	260,843,811	572,717	73,897,812	—	335,924,340*	65.67

*Note:* \*Of these shares and warrants of the Company, 260,843,811 shares and warrants carrying 73,897,812 underlying shares deemed to be interested by Messrs. Lincoln Lu and Lambert Lu represented the same interests and were therefore duplicated amongst these two directors for the purpose of the SFO. 260,843,811 shares and warrants carrying 71,786,743 underlying shares out of such shares were held by Nan Luen International Limited, which was 62.77% owned by JCS Limited ("JCS"), and warrants carrying 2,111,069 underlying shares were held directly by JCS. JCS was 26.09% owned by a discretionary trust, of which both directors are beneficiaries. In addition, Messrs. Lincoln Lu and Lambert Lu were each interested in 10.87% in JCS directly. JCS is deemed to be a controlled corporation of each of Messrs. Lincoln Lu and Lambert Lu by virtue of the SFO.

## 2.2 Long positions in shares and underlying shares of associated corporations

### (a) *JCS Limited*

Name of Director	Interests as discretionary trust		Total	% of shares in issue
	Beneficial interests	trust beneficiary		
Lu Wing Chi	2,000	12,000 <sup>1</sup>	14,000	30.43
Lincoln Lu	5,000	12,000 <sup>1</sup>	17,000	36.96
Lambert Lu	5,000	12,000 <sup>1</sup>	17,000	36.96

### (b) *Nan Luen International Limited*

Name of Director	Interests held by controlled corporation	% of shares in issue
Lincoln Lu	98,210 <sup>2</sup>	62.77
Lambert Lu	98,210 <sup>2</sup>	62.77

*Notes:*

- 12,000 shares in JCS Limited deemed to be interested by Messrs. Lu Wing Chi, Lincoln Lu and Lambert Lu represented the same interests and were therefore duplicated amongst these three directors for the purpose of the SFO. Such shares were held by a discretionary trust, of which all three directors are beneficiaries.
- 98,210 shares in Nan Luen International Limited deemed to be interested by Messrs. Lincoln Lu and Lambert Lu represented the same interests and were therefore duplicated amongst these two directors for the purpose of the SFO. Those shares were held by JCS Limited, which is deemed to be a controlled corporation of each of Messrs. Lincoln Lu and Lambert Lu by virtue of the SFO.

Saved as disclosed herein, as at the Latest Practicable Date, none of the Directors or chief executives of the Company or their respective associates had any interests or short positions in the shares, underlying shares or debentures of the Company or any of its associated corporations (within the meaning of Part XV of the SFO) as recorded in the register required to be kept under Section 352 of the SFO, or as otherwise notified to the Company and the HKSE pursuant to the Model Code for Securities Transactions by Directors of Listed Companies.

### 3. DISCLOSURE OF INTERESTS BY PERSONS REQUIRED TO GIVE DISCLOSURE PURSUANT TO DIVISIONS 2 AND 3 OF THE SFO

So far as is known to any Director or chief executive of the Company, as at the Latest Practicable Date, persons (other than a Director or chief executive of the Company) who had interests or short positions in the shares or underlying shares of the Company as recorded in the register required to be kept by the Company under Section 336 of the SFO, were as follows:

#### Long positions in shares and underlying shares of the Company

Name of shareholders	Capacity	Number of shares	Number of underlying shares (warrants)	Total	% of shares in issue
<i>Substantial shareholders</i>					
JCS Limited <sup>2</sup>	Beneficial interests Held by controlled corporation	— 260,843,811	2,111,069 71,786,743	2,111,069 <u>332,630,554<sup>1</sup></u>	
				<u>334,741,623</u>	65.44
Eaver Company Limited <sup>3</sup>	Beneficial interests Held by controlled corporation	608,000 260,843,811	— 71,786,743	608,000 <u>332,630,554<sup>1</sup></u>	
				<u>333,238,554</u>	65.14
Nan Luen International Limited <sup>4</sup>	Beneficial interests	260,843,811	71,786,743	332,630,554	65.03
<i>Others</i>					
Pacific Rose Enterprises Limited	Beneficial interests	31,955,873	3,581,257	35,537,130	6.95
Cypress Gold Limited	Beneficial interests	20,013,043	7,711,957	27,725,000	5.42

*Notes:*

1. 260,843,811 shares and warrants carrying 71,786,743 underlying shares deemed to be interested by JCS Limited, Eaver Company Limited and Nan Luen International Limited represented the same interests and were therefore duplicated amongst these three shareholders for the purpose of the SFO. JCS Limited and Eaver Company Limited were respectively interested in 62.77% and 37.23% in Nan Luen International Limited, which in turn was interested in these shares and warrants.
2. Messrs. Lu Wing Chi, Lu Wing Lin, Lincoln Lu and Lambert Lu, all of whom are directors of the Company, are also directors of JCS Limited.
3. Mr. Lu Yong Lee, a director of the Company, is also a director of Eaver Company Limited.
4. Messrs. Lu Wing Chi, Lu Wing Lin, Lu Wing Yuk, Andrew, Lu Yong Lee, Lincoln Lu and Lambert Lu, all of whom are directors of the Company, are also directors of Nan Luen International Limited.

Save as disclosed above, the Directors are not aware of any other person who, as at the Latest Practicable Date, had interests or short positions in the shares or underlying shares of the Company as recorded in the register required to be kept under Section 336 of the SFO.

#### 4. COMPETING INTERESTS

As at the Latest Practicable Date, each of the following Directors and his associates are considered by the Company to have interests in businesses which compete with, or might compete with, either directly or indirectly, the businesses of the Group, other than those businesses where such Directors have been appointed to represent the interests of the Company and/or other members of the Group:

Messrs. Lu Wing Chi and Lu Wing Lin are executive Directors of the Company. They also hold shareholdings (on behalf of themselves and their associates) and directorships in a number of private companies controlled by, or owned in conjunction with, their close relatives and associates. From time to time, such companies are involved in real estate development and investment, textile manufacturing and trading. In this regard, Messrs. Lu Wing Chi and Lu Wing Lin are considered to have interests in businesses which compete with, or might compete with, either directly or indirectly, the businesses of the Group.

Mr. Tse Man Bun is an executive Director. He also acts as independent non-executive director of HSBC Insurance (Asia) Limited, HSBC Medical Insurance (Asia) Limited and Tysan Holdings Limited. The principal business of Tysan Holdings Limited includes building construction, property development, investment and management. In this regard, he is considered to have interests in businesses which complete with or might compete with, either directly or indirectly, the businesses of the Group. In addition, Mr. Tse and his associates also invest from time to time in real estate investments. However, the

scale and nature of such investments do not fit the investment profile of the Group. Hence, Mr. Tse is not considered by the Group to have interests which compete with or might compete with, the businesses of the Group as a result of such investments.

Mr. Lu Wing Yuk, Andrew is also the managing director of Kian Nan Trading Company Limited which businesses includes textile manufacturing and trading. Mr. Lu Wing Yuk, Andrew is also a relative of Messrs. Lu Wing Chi and Lu Wing Lin and holds shareholdings (on behalf of himself and his associates) and directorships in a number of private companies controlled by, or owned in conjunction with, his close relatives and associates. From time to time, such companies are involved in real estate development and investment. In this regard, Mr. Lu Wing Yuk, Andrew is considered to have interests in businesses which compete with, or might compete with, either directly or indirectly, the businesses of the Group.

Messrs. Lincoln Lu and Lambert Lu are sons of Mr. Lu Wing Chi. In this regard, Messrs. Lincoln Lu and Lambert Lu are considered to have interests in the competing businesses which Mr. Lu Wing Chi is deemed interested. Messrs. Lincoln Lu and Lambert Lu also hold shareholdings (on behalf of themselves and their associates) and directorships in a number of private companies controlled by, or owned in conjunction with, their close relatives and associates. From time to time, such companies are involved in real estate development and investment, textile manufacturing and trading. In this regard, Messrs. Lincoln Lu and Lambert Lu are considered to have interests in businesses which compete with, or might compete with, either directly or indirectly, the businesses of the Group.

Mr. Lu Yong Lee holds shareholdings (on behalf of himself and his associates) and directorships in a number of private companies controlled by, or owned in conjunction with, his close relatives and associates. From time to time, such companies are involved in real estate development and investment. In this regard, Mr. Lu Yong Lee is considered to have interests in businesses which compete with, or might compete with, either directly or indirectly, the businesses of the Group.

Mr. Walujo Santoso, Wally and his associates invest from time to time in real estate investments and real estate developments. In this regard, Mr. Walujo Santoso, Wally is considered to have interests in businesses which compete with or might compete with, either directly or indirectly, the businesses of the Group.

Mr. Leung Hok Lim is also director of a number of private and listed companies. Some of these companies and their associates are involved in property development and investment. In addition, Mr. Leung Hok Lim and his associates invest from time to time in real estate investments and real estate developments. In this regard, Mr. Leung Hok Lim is considered to have interests in businesses which compete with, or might compete with, either directly or indirectly, the businesses of the Group.

Mr. Chung Pui Lam and his associates invest from time to time in real estate investments and real estate developments. In this regard, Mr. Chung is considered to have interests in businesses which compete with or might compete with, either directly or indirectly, the businesses of the Group.

## 5. SERVICE CONTRACTS

No Director has entered into a service contract with any member of the Group which does not expire or is not terminable by such member of the Group within one year without payment of compensation, other than statutory compensation.

## 6. LITIGATION

None of the Company nor any of its subsidiaries is engaged in any litigation or arbitration or claim of material importance and, so far as the Directors are aware, no litigation or arbitration or claim of material importance is pending or threatened by or against the Company or any of its subsidiaries.

## 7. MISCELLANEOUS

- (a) The Qualified Accountant of the Company is Mr. Lee Bo Yuen, Tom, *MBA, BSc., FCCA, FCPA, ACIS, ACS*.
- (b) The Secretary of the Company is Mrs. Jenifer Sin, *MBA, LLB, FCIS*.
- (c) The ultimate controlling shareholder of the Company is JCS Limited.
- (d) The Company's Hong Kong branch share registrar and transfer office is Standard Registrars Limited, which is situated at 28th Floor, Bank of East Asia Harbour View Centre, 56 Gloucester Road, Wanchai, Hong Kong.
- (e) This circular has been prepared in both English and Chinese. In the case of any discrepancy, the English text shall prevail.