

16 June 2016

Ms Tan Geok Bee

[By email and by courier]

2 Marina Boulevard #52-06 The Sail @ Marina Bay Singapore 018987

[egm2016.imperiumcrown@gmail.com]

Third Rose Asia Sdn Bhd

25-1 (Room 1), Jalan 3/93 Off Jalan Lombong, Taman Miharja Kuala Lumpur Wilayah Persekutuan Malaysia 55200

D-7-3 Blk D Lvl 9, Menara Uncang Emas, 85 Jalan Loke Yew 55200 Kuala Lumpur Malaysia

Attention: Mr Wan Jinn Woei / Mr Wan Jinn Yuan

[kitfoo.chye@gmail.com]

Dear Sirs

- 1. We refer to the following notifications to the Company on 27 April 2016:
 - a. Notification by Mr Lim Chuan Lam of the disposal of his interest in the Shares, pursuant to a sale and purchase agreement on 25 April 2016 for the sale of the Shares;
 - Notification by Ms Tan Geok Bee of her direct interest pursuant to her acquisition of the Shares; and
 - c. Notification by Third Rose Asia Sdn Bhd ("TRA") to Imperium Crown Limited ("the Company") on 27 April 2016 ("TRA Notification").
- 2. Under the TRA Notification, TRA notified the Company of its deemed interest in the 68,925,925 shares in the Company ("the Shares") "held through Tan Geok Bee as it has nominated Tan Geok Bee to hold the [Shares] for and on [its behalf]".
- 3. We also refer to the letter dated 9 May 2016 sent to the Company. In the said letter, Ms Tan Geok Bee signed off the said letter "on behalf of" TRA. Given this and the TRA Notification, we presume that Ms Tan Geok Bee is not the beneficial owner of the Shares, and holds the Shares on trust for TRA.



- Pursuant to section 137F of the Securities and Futures Act (Cap. 289) ("SFA"), we require Ms Tan Geok Bee to state:
 - a. whether she does in fact hold the Shares on trust for TRA, and if not, to state the persons for whom she holds the Shares (either by name or by other particulars sufficient to enable those persons to be identified) and the nature of their interest; and
 - b. whether any of the voting rights in the Shares are the subject of an agreement or arrangement under which another person is entitled to control the exercise of those rights and, if so, to let us have particulars of the agreement or arrangement and the parties to it.
- 5. Person(s) who have deemed interest in the Shares are required under the law to make the necessary disclosure.
- 6. A "deemed interest" in shares in a body corporate, is *inter alia*, defined under sections 7(4) and 7(4A) of the Companies Act (Cap. 50) ("Companies Act") and sections 4(4) and 4(5) of the SFA.
- 7. Thus, parties other than TRA who are deemed to have an interest in the Shares are required by law, to disclose his / their substantial shareholding interest in the Shares (and provide the necessary notification) under section 82 of the Companies Act and section 135 of the SFA. Failure to do so constitutes an offence.
- 8. To date, other than the TRA Notification, the Company has not received any notification from any person disclosing his / their deemed interest in the Shares.
- 9. Accordingly, we require TRA to state, under section 137F of the SFA:
 - a. Whether TRA holds the Shares as beneficial owner or as trustee;
 - If TRA holds the Shares as trustee, to indicate the persons for whom TRA holds the Shares (either by name or by other particulars sufficient to enable those persons to be identified) and the nature of their interest; and
 - c. The details of the person(s) who are deemed interested in the Shares.
- 10. Please let us hear from you on the above by 12 noon on 20 June 2016.

Yours sincerely,

Koh Chai Nyuk

Chief Financial Officer

For and on behalf of Imperium Crown Limited