

Building a better world
for our **Future Generations**



IVORY PROPERTIES GROUP BERHAD

Company No: 673211-M (Incorporated in Malaysia under the Companies Act, 1965)

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Incorporated in Malaysia under the Companies Act, 1965

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PROSPECTUS

PUBLIC ISSUE OF 44,899,000 NEW ORDINARY SHARES OF RM0.50 EACH COMPRISING:-

- 9,300,000 NEW ORDINARY SHARES OF RM0.50 EACH AVAILABLE FOR APPLICATION BY THE MALAYSIAN PUBLIC;
- 1,000,000 NEW ORDINARY SHARES OF RM0.50 EACH AVAILABLE FOR APPLICATION BY THE ELIGIBLE DIRECTORS, EMPLOYEES AND BUSINESS ASSOCIATES OF OUR COMPANY AND OUR SUBSIDIARIES;
- 34,029,000 NEW ORDINARY SHARES OF RM0.50 EACH AVAILABLE FOR PRIVATE PLACEMENT TO SELECTED INVESTORS; AND
- 570,000 NEW ORDINARY SHARES OF RM0.50 EACH TO BUMIPUTERA INVESTORS APPROVED BY THE MINISTRY OF INTERNATIONAL TRADE AND INDUSTRY;

AND

OFFER FOR SALE OF 16,170,000 ORDINARY SHARES OF RM0.50 EACH TO BUMIPUTERA INVESTORS APPROVED BY THE MINISTRY OF INTERNATIONAL TRADE AND INDUSTRY.

AT AN ISSUE/ OFFER PRICE OF **RM1.00** PER ORDINARY SHARE PAYABLE IN FULL ON APPLICATION PURSUANT TO OUR LISTING ON THE MAIN MARKET OF BURSA MALAYSIA SECURITIES BERHAD.

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PROSPECTUS

THIS PROSPECTUS IS DATED 12 JULY 2010

*Adviser, Managing Underwriter,
Underwriter and Sole Placement Agent*

AmInvestment Bank Berhad
(Company No. 23742-V)
A member of



AmInvestment Bank
Group

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INDICATIVE TIMETABLE

The indicative timing of events leading up to the listing of and quotation for our entire enlarged issued and paid-up share capital on the Main Market of Bursa Malaysia Securities Berhad is set out below:-

<u>Date</u>	<u>Event</u>
12 July 2010	: Issue of Prospectus/ opening date of the Initial Public Offering ("IPO")
19 July 2010	: Closing date of the IPO
21 July 2010	: Tentative date for balloting of applications
27 July 2010	: Tentative date for allotment of IPO shares
28 July 2010	: Tentative listing date

THIS TIMETABLE IS TENTATIVE AND IS SUBJECT TO CHANGES WHICH MAY BE NECESSARY TO FACILITATE IMPLEMENTATION PROCEDURES.

THE APPLICATION PERIOD WILL REMAIN OPEN UNTIL 5.00 P.M. ON 19 JULY 2010 OR FOR SUCH FURTHER PERIOD OR PERIODS AS OUR DIRECTORS, PROMOTER AND OFFERORS TOGETHER WITH OUR MANAGING UNDERWRITER IN THEIR ABSOLUTE DISCRETION MAY MUTUALLY DECIDE. WE WILL NOT ACCEPT LATE APPLICATIONS.

IN THE EVENT THAT THE CLOSING DATE FOR THE APPLICATIONS IS EXTENDED, YOU WILL BE NOTIFIED OF THE CHANGE IN A WIDELY CIRCULATED ENGLISH AND BAHASA MALAYSIA NEWSPAPER IN MALAYSIA. SHOULD THE APPLICATION PERIOD BE EXTENDED, THE DATES FOR THE BALLOTING OF THE APPLICATIONS AND THE LISTING OF OUR COMPANY WILL BE EXTENDED ACCORDINGLY.

DEFINITIONS

In this Prospectus, unless where the context requires otherwise, the following words and abbreviations shall have the following meanings:-

- Acquisitions** : The acquisitions of G&A, IASB, ICSB, IFSB, 40% IGSB, 60% IGSB, IISB, IMSB, IPMSB, ISSB, ITSSB, IUSB, IVSB and Sunlink
- Acquisition of G&A** : The acquisition by our Company of 100% of the issued and paid-up share capital of G&A comprising 100,000 ordinary shares of RM1.00 each for a purchase consideration of RM495,081 satisfied by the issuance of 409,158 new Shares credited as fully paid-up at an issue price of RM1.21 per Share
- Acquisition of IASB** : The acquisition by our Company of 100% of the issued and paid-up share capital of IASB comprising 6,500,000 ordinary shares of RM1.00 each for a purchase consideration of RM102,118,975 satisfied by the issuance of 84,395,847 new Shares credited as fully paid-up at an issue price of RM1.21 per Share
- Acquisition of ICSB** : The acquisition by our Company of 49% of the issued and paid-up share capital of ICSB comprising 980,000 ordinary shares of RM1.00 each for a purchase consideration of RM214,647 satisfied by the issuance of 177,394 new Shares credited as fully paid-up at an issue price of RM1.21 per Share
- Acquisition of IFSB** : The acquisition by our Company of 100% of the issued and paid-up share capital of IFSB comprising 100,000 ordinary shares of RM1.00 each for a purchase consideration of RM59,247 satisfied by the issuance of 48,964 new Shares credited as fully paid-up at an issue price of RM1.21 per Share
- Acquisition of 40% IGSB** : The acquisition by our Company of 40% of the issued and paid-up share capital of IGSB comprising 1,200,000 ordinary shares of RM1.00 each for a purchase consideration of RM49,425,357 satisfied by the issuance of 40,847,403 new Shares credited as fully paid-up at an issue price of RM1.21 per Share
- Acquisition of 60% IGSB** : The acquisition by our Company of 60% of the issued and paid-up share capital of IGSB from IASB comprising 1,800,000 ordinary shares of RM1.00 each for a cash consideration of RM1,800,000. Prior to the Acquisitions, IGSB was a 60% owned subsidiary of IASB
- Acquisition of IISB** : The acquisition by our Company of 100% of the issued and paid-up share capital of IISB comprising 250,000 ordinary shares of RM1.00 each for a purchase consideration of RM228,378 satisfied by the issuance of 188,742 new Shares credited as fully paid-up at an issue price of RM1.21 per Share
- Acquisition of IMSB** : The acquisition by our Company of 100% of the issued and paid-up share capital of IMSB comprising 1,000,000 ordinary shares of RM1.00 each for a purchase consideration of RM8,296,299 satisfied by the issuance of 6,856,445 new Shares credited as fully paid-up at an issue price of RM1.21 per Share
- Acquisition of IPMSB** : The acquisition by our Company of 100% of the issued and paid-up share capital of IPMSB comprising 100,000 ordinary shares of RM1.00 each for a purchase consideration of RM222,422 satisfied by the issuance of 183,820 new Shares credited as fully paid-up at an issue price of RM1.21 per Share

DEFINITIONS (Cont'd)

Acquisition of ISSB	:	The acquisition by our Company of 100% of the issued and paid-up share capital of ISSB comprising 1,920,000 ordinary shares of RM1.00 each for a purchase consideration of RM8,727,778 satisfied by the issuance of 7,213,040 new Shares credited as fully paid-up at an issue price of RM1.21 per Share
Acquisition of ITSSB	:	The acquisition by our Company of 100% of the issued and paid-up share capital of ITSSB comprising 2 ordinary shares of RM1.00 each for a cash consideration of RM2
Acquisition of IUSB	:	The acquisition by our Company of 100% of the issued and paid-up share capital of IUSB comprising 2 ordinary shares of RM1.00 each for a cash consideration of RM2
Acquisition of IVSB	:	The acquisition by our Company of 49% of the issued and paid-up share capital of IVSB comprising 490,000 ordinary shares of RM1.00 each for a purchase consideration of RM943,851 satisfied by the issuance of 780,042 new Shares credited as fully paid-up at an issue price of RM1.21 per Share
Acquisition of Sunlink	:	The acquisition by our Company of 100% of the issued and paid-up share capital of Sunlink comprising 100,000 ordinary shares of RM1.00 for a cash consideration of RM100,000
Acquisitions via Share Swap	:	The Acquisition of IASB, Acquisition of IMSB, Acquisition of ISSB, Acquisition of IPMSB, Acquisition of G&A, Acquisition of 40% IGSB, Acquisition of IISB, Acquisition of IFSB, Acquisition of ICSB and Acquisition of IVSB
Act	:	The Companies Act, 1965 including any statutory modification, amendment or re-enactment thereof for the time being in force
ADA	:	Authorised Depository Agent
ADA Code	:	ADA (Broker) Code
Admission	:	Admission of the Shares to the Official List of the Main Market of Bursa Securities
Adviser	:	AmInvestment Bank
AmInvestment Bank	:	AmInvestment Bank Berhad (23742-V), a member of AmInvestment Bank Group
Application(s)	:	The application(s) for the IPO Shares by way of Application Forms or by way of Electronic Share Application
Application Form(s)	:	The printed application form(s) for the application for the IPO Shares
Articles	:	The Articles of Association, including any amendment thereto that may be made from time to time
ATM	:	Automated Teller Machine
Board	:	Board of Directors of our Company
Bursa Depository	:	Bursa Malaysia Depository Sdn Bhd (165570-W)

DEFINITIONS (Cont'd)

Bursa Securities	: Bursa Malaysia Securities Berhad (635998-W)
CCC	: Certificate of completion and compliance
CDS	: Central Depository System
Central Depositories Act	: The Securities Industry (Central Depositories) Act, 1991 including statutory modification, amendment or re-enactment thereof for the time being in force
CF	: Certificate of fitness for occupation
CIDB	: Construction Industry Development Board Malaysia
CMSA	: The Capital Markets and Services Act 2007 of Malaysia, as may be amended, supplemented or modified from time to time
Commercial Property	: Refers to office (include purpose-built offices and office space in shophouse), shop and shopping complex (include pre-war shop, post-war shop, retail lot in shopping complex and lock-up shop)
Depositor	: A holder of a Securities Account
EBIDTA	: Earnings before interest, depreciation, tax and amortisation
ECU	: Unit Pematuhan Ekuiti, Jabatan Pengambilan dan Percantuman of the SC
Electronic Prospectus	: A copy of this Prospectus that is issued, circulated or disseminated via the internet, and/or an electronic storage medium, including but not limited to CD-ROMs or floppy disks
Electronic Share Application	: An application for the IPO Shares through a Participating Financial Institutions' ATM
EPF	: Employment Provident Fund
EPS	: Earnings per Share
Existing Stocks	: Units that have been issued with the CF or temporary CF prior to the review period plus units already completed and issued with CF/ temporary CF within the review period
FIC	: Foreign Investment Committee
FYE	: Financial year ended or, as the case may be, ending 31 December
GDP	: Gross domestic product
GDV	: Gross development value
GNP	: Gross national product
GP	: Gross profit
G&A	: G & A Consultancy Sdn Bhd (527624-W)
G7	: Grade 7

DEFINITIONS (Cont'd)

IASB	:	Ivory Associates Sdn Bhd (485576-P)
ICSB	:	Ivory Continental Sdn Bhd (490558-K)
IFSB	:	Ivory Furniture & Interior Sdn Bhd (629320-D)
IGSB	:	Ivory Gleneary Sdn Bhd (548788-M)
IISB	:	Ivory Indah Sdn Bhd (593357-M)
Illustration I	:	Representing the illustration where the net revaluation surplus amounting to approximately RM71.06 million (as set out in note (n) in Section 8.1.1, note (g) in Section 8.1.2(i) and note (e) in Section 8.1.2(iii) of this Prospectus) was not booked into the financial statements of our Group, consistent with the Merger Method of Accounting adopted for the acquisition of all the subsidiaries except for ITSSB, IUSB and Sunlink of which the purchase consideration of ITSSB, IUSB and Sunlink was via cash
Illustration II	:	Representing the illustration after taking into consideration the net revaluation surplus amounting to approximately RM71.06 million (as set out in note (n) in Section 8.1.1, note (g) in Section 8.1.2(i) and note (e) in Section 8.1.2(iii) of this Prospectus)
IMSB	:	Ivory Meadows Sdn Bhd (492123-A)
Internet Participating Financial Institution(s)	:	Participating organisation(s) in the Internet Share Application
Internet Share Application	:	Application for the IPO Shares through an Internet Participating Financial Institution
IPMSB	:	Ivory Property Management Services Sdn Bhd (517654-M)
IPO or Initial Public Offering	:	Initial public offering comprising the Public Issue and Offer For Sale, collectively
IPO Price	:	RM1.00 per IPO Share, being the price payable by investors under the Public Issue / Offer For Sale
IPO Share(s)	:	The Public Issue Share(s) and Offer Share(s) collectively
ISO	:	International Organisation for Standardisation
ISSB	:	Ivory Square Sdn Bhd (510587-P)
ITSSB	:	Ivory Times Square Sdn Bhd (791405-M)
IUSB	:	Ivory Utilities Sdn Bhd (834590-A)
IVSB	:	Ivory Villas Sdn Bhd (553323-V)
Ivory Group or Group	:	Ivory and our subsidiaries
Ivory or Company	:	Ivory Properties Group Berhad (673211-M)

DEFINITIONS (Cont'd)

LAT	:	Loss after taxation
LBT	:	Loss before taxation
Leisure Property	:	Leisure property includes hotel, motel, resort, recreational park, golf course and marina
Listing	:	The admission to the Official List and the listing of and quotation for our entire enlarged issued and paid-up share capital of RM93,000,000 comprising 186,000,000 Shares on the Main Market of Bursa Securities
Listing Requirements	:	Bursa Securities Main Market Listing Requirements
Listing Scheme	:	The Subdivision, Acquisitions, Rights Issue, Public Issue, Offer For Sale and Listing collectively
LPD	:	30 April 2010, being the latest practicable date prior to the printing of this Prospectus
LPS	:	Loss per share
Malaysian Public or Public	:	Citizens of Malaysia and companies, societies, co-operatives and institutions incorporated or organised under the laws of Malaysia
Managing Underwriter or Underwriter	:	AmInvestment Bank
Market Day(s)	:	A day on which the Bursa Securities is open for the trading
MDTM	:	Majlis Daerah Tanjung Malim
MI	:	Minority interest
MIH or Issuing House	:	Malaysian Issuing House Sdn Bhd (258345-X)
MITI	:	Ministry of International Trade and Industry
MPPP	:	Majlis Perbandaran Pulau Pinang
MPSP	:	Majlis Perbandaran Seberang Perai
NA	:	Net assets
NBV	:	Net book value
NTA	:	Net tangible assets
NTL	:	Net tangible liabilities
Offer For Sale or Offer	:	Offer for sale by the Offerors of 16,170,000 Shares in our Company at an offer price of RM1.00 per Share, payable in full upon application, subject to the terms and conditions of this Prospectus
Offer Shares	:	The 16,170,000 Shares in our Company which are the subject of the Offer For Sale

DEFINITIONS (Cont'd)

Offerors or Selling Shareholders : Dato' Low Eng Hock, Othaman @ Osman Bin Kallahan, Dato' Tan Yew Thong, Ooi Choi Kiat, Dato' Teh Yeong Keat, Loh Chin Chuen and Chow Kah Hoong collectively. Their respective Offer Shares are as follows:-

Offerors	No. of Offer Shares	% of Enlarged Share Capital
Dato' Low Eng Hock	6,000,138	3.22
Othaman @ Osman Bin Kallahan	4,279,294	2.30
Dato' Tan Yew Thong	3,804,840	2.05
Ooi Choi Kiat	2,000,000	1.08
Dato' Teh Yeong Keat	82,813	0.04
Loh Chin Chuen	1,730	*
Chow Kah Hoong	1,185	*
Total	16,170,000	8.69

* *Immaterial*

Official List : The list of all securities which have been admitted for quotation in accordance with the Listing Requirements

Participating Financial Institution(s) : The participating financial institutions for Electronic Share Application as listed in Section 16.5.2(xv) of this Prospectus

PAT : Profit after taxation

PBT : Profit before taxation

PE Multiple : Price earnings multiple

Pink Form Shares : The 1,000,000 Public Issue Shares of our Company representing approximately 0.54% of the enlarged issued and paid-up share capital of our Company at the IPO Price to the eligible Directors, employees and business associates of our Group

Placement Shares : The 34,029,000 Shares in our Company which are the subject of the Private Placement

Prescribed Security : Shares of a company that are prescribed by Bursa Securities to be deposited in the CDS subject to the provision of the Central Depositories Act and the Rules

Private Placement : Private placement of 34,029,000 new Shares in our Company representing approximately 18.30% of the enlarged issued and paid-up share capital of our Company at the IPO Price to selected investors (who are deemed public) by the Sole Placement Agent

Promoter : Dato' Low Eng Hock

Property Overhang : Property overhang refers to completed property issued with CF or temporary CF but remained unsold for more than nine months after launching for sale

Prospectus : This Prospectus dated 12 July 2010 issued by our Company in respect of the IPO

PSP : Principal submitting person

PTG : Pejabat Tanah dan Galian

DEFINITIONS (Cont'd)

Public Issue	:	The public issue of 44,899,000 new Shares in our Company at an issue price of RM1.00 per Share, payable in full upon application, subject to the terms and conditions of this Prospectus
Public Issue Shares	:	The 44,899,000 new Shares in our Company which are the subject of the Public Issue
QA	:	Quality assurance
R&D	:	Research and development
Record of Depositors	:	A record provided by the Central Depository to our Company under Chapter 24.0 of the Rules
Residential Property	:	Refers to buildings for housing accommodation, among many others include terrace house, semi-detached, bungalow, flat, apartment, condominium and townhouses of various levels
Retail Property	:	Refers to shop and shopping complex
Rights Issue	:	The rights issue of 141 new Shares in our Company at an issue price of RM1.21 per Share to the existing shareholders of our Company on the basis of approximately ten (10) Rights Shares for every existing ten million (10,000,000) Shares held in our Company
Rights Shares	:	The 141 new Shares in our Company issued pursuant to the Rights Issue
RM and sen	:	Ringgit Malaysia and sen respectively
ROC	:	Registrar of Companies, Malaysia
Rules	:	The Rules of Bursa Depository
SAC	:	Shariah Advisory Council of the SC
SC	:	Securities Commission
SC Guidelines	:	The Equity Guidelines issued by the SC, including any modification or amendment thereto that may be made
Securities Account	:	An account established by Bursa Depository for a Depositor for the recording of deposit of securities and for dealing in such securities by the Depositor
Share(s)	:	Ordinary share(s) of RM0.50 each
Sole Placement Agent	:	AmlInvestment Bank
SPNB	:	Syarikat Perumahan Negara Berhad
Subdivision	:	The subdivision of 2 ordinary shares of RM1.00 each into 4 new Shares on the basis of two (2) new Shares for every one (1) existing ordinary share of RM1.00 each held
Sunlink	:	Sunlink Properties Sdn Bhd (836156-U)

DEFINITIONS (Cont'd)

Underwriting Agreement	:	The Underwriting Agreement dated 21 April 2010 between our Company, Offerors, Managing Underwriter and Underwriter for the underwriting of 10,300,000 Public Issue Shares upon the terms and subject to the conditions contained therein
USA or US	:	United States of America
USD	:	US Dollars
Vital Factor	:	Vital Factor Consulting Sdn Bhd

INTERPRETATION

All references to "Company" and "Ivory" in this Prospectus are to Ivory Properties Group Berhad, references to "our Group" is to our Company and our subsidiaries, and references to "we", "us", "our" and "ourselves" are to our Company, and where the context requires, our Company and our subsidiaries.

Unless the context otherwise requires, references to "management" are to our Directors and key management personnel as at the date of this Prospectus. Statements as to our beliefs, expectations, estimates and opinions are those of our Directors.

Certain acronyms, technical terms and other abbreviations used are defined in the "Definitions" section of this Prospectus. Words denoting the singular shall, where applicable, include the plural and *vice versa*, and words referring to the masculine gender shall, where applicable, include the feminine and neuter genders and *vice versa*. References to persons shall include companies or corporations.

Any reference in this Prospectus, the Application Form(s), Electronic Share Applications or Internet Share Applications to any legislation, statute or statutory provision is a reference to that legislation, statute or statutory provision for the time being as amended or re-enacted, and to any repealed legislation, statute or statutory provision which it re-enacts (with or without modification). Any word defined in the Act, CMSA, Listing Requirements or any statutory modification thereof and used in this Prospectus and the Application Form(s) shall, where applicable, have the meaning ascribed to it under the Act, CMSA, Listing Requirements or any statutory modification thereof (as the case may be).

Any reference to a time of day in this Prospectus, the Application Form(s), Electronic Share Applications or Internet Share Applications shall be a reference to Malaysia time unless otherwise stated.

The information on our websites, or any website directly or indirectly linked to such websites does not form part of this Prospectus and you should not rely on it.

The term "entity" includes a corporation, an unincorporated association, a partnership and the government of any state, but does not include a trust.

The word "approximately" used in this Prospectus is to indicate that a number is not an exact one, but that number is usually rounded off to the nearest tenth/ hundredth or one/ two decimal places. Any numeric discrepancies in the tables included in this Prospectus between the listed amounts and the totals thereof are due to rounding differences.

In this Prospectus, references to "a person who is deemed connected" with another are references to such persons as defined under Section 122A of the Act. A person shall be deemed connected to a Director or substantial shareholder of Ivory if he is:-

- (a) a member of that Director's or substantial shareholder's family, which is defined to include his spouse, parent, child (including adopted child and step-child), brother, sister and the spouse of his child, brother or sister;
- (b) a body corporate that is associated with that Director or substantial shareholder;
- (c) a trustee of a trust (other than a trustee for an employee share scheme or pension scheme) under which that Director or substantial shareholder or member of his family is a beneficiary; or
- (d) a partner of that Director or substantial shareholder, or a partner of a person connected with the Director or substantial shareholder.

INTERPRETATION (Cont'd)

In this Prospectus, references to "a substantial shareholder" shall have the meaning defined under the Act. A person has a substantial shareholding in a company:-

- (a) if he has an interest or interests in one or more voting shares in the company and the nominal amount of that share, or the aggregate of the nominal amounts of those shares, is not less than five per centum of the aggregate of the nominal amounts of all the voting shares in the company; or
- (b) if, being a company the share capital of which is divided into two or more classes of the shares, if he has an interest or interests in one or more voting shares included in one of those classes and the nominal amount of that share, or the aggregate of the nominal amounts of those shares, is not less than five per centum of the aggregate of the nominal amounts of all the voting shares included in that class.

"A body corporate is associated with a Director or substantial shareholder" as defined under the Act, if:-

- (a) the body corporate is accustomed or is under an obligation, whether formal or informal, or its Directors or substantial shareholders are accustomed, to act in accordance with the directions, instructions or wishes of that Director or substantial shareholder;
- (b) that Director or substantial shareholder has a controlling interest in the body corporate; or
- (c) that Director or substantial shareholder or persons connected with him, or that Director or substantial shareholder and persons connected with him, are entitled to exercise, or control the exercise of, not less than fifteen per centum of the votes attached to the voting shares in the body corporate.

This Prospectus contains forward-looking statements, which are statements other than statements of historical facts, and are based on assumptions that are subject to known and unknown risks, uncertainties and contingencies. The words, such as "believe", "plan", "expect", "intend", "estimate" and similar expressions are used to identify such forward-looking statements. These forward-looking statements represent our Directors' views and beliefs with respect to the future of our Group, and do not constitute a guarantee of the future performance of our Group.

CORPORATE DIRECTORY**BOARD OF DIRECTORS**

Name	Designation	Address	Nationality/ Profession
Dato' Low Eng Hock	Chairman/ Chief Executive Officer	2182-D, Lorong Kampung Pisang 05100 Alor Setar Kedah	Malaysian/ Company Director
Dato' Seri Nazir Ariff Bin Mushir Ariff	Deputy Chairman/ Executive Director	18, Puncak Bukit Mutiara 11200 Tanjung Bungah Penang	Malaysian/ Company Director
Loh Chin Chuen	Executive Director	15-1-7, Desa Embun Emas Apartment Lorong Sungai Kelian 11200 Tanjung Bungah Penang	Malaysian/ Company Director
Ooi Choi Kiat	Non-Independent Non-Executive Director	27, Jalan Ibu Kota 8 Taman Ibu Kota 53100 Kuala Lumpur	Malaysian/ Company Director
Loh Chye Teik	Independent Non- Executive Director	2nd Floor, Silver Square 309-J, Jalan Perak 10150 Penang	Malaysian/ Chartered Accountant
Dr Asairinachan @ Aravinachan A/L Kunjambo	Independent Non- Executive Director	No. 81, Medan Athinahapan 2 Taman Tun Dr. Ismail 60000 Kuala Lumpur	Malaysian/ Company Director
Lim Hock Siu	Independent Non- Executive Director	1-23-A, Solok Tembaga Island Park 11600 Penang	Malaysian/ Company Director

AUDIT COMMITTEE

Name	Designation	Directorship
Loh Chye Teik	Chairman	Independent Non-Executive Director
Ooi Choi Kiat	Member	Non-Independent Non-Executive Director
Lim Hock Siu	Member	Independent Non-Executive Director

CORPORATE DIRECTORY (Cont'd)

- COMPANY SECRETARY** : Lam Voon Kean (MIA 4793)
9 Reservoir, 5th Avenue
11500 Penang
- REGISTERED OFFICE** : Suite 2-1, 2nd Floor
Menara Penang Garden
42-A, Jalan Sultan Ahmad Shah
10050 Penang
Telephone No. : (04) 229 4390
Facsimile No. : (04) 226 5860
- HEAD OFFICE** : Birch House
No. 73, Jalan Dato Keramat
10150 Georgetown
Penang
Telephone No. : (04) 210 8000
Facsimile No. : (04) 227 0000
Email : ivorypg@po.jaring.my
Website : www.ivory.com.my
- SHARE REGISTRAR** : AGRITEUM Share Registration Services Sdn Bhd (578473-T)
2nd Floor, Wisma Penang Garden
42, Jalan Sultan Ahmad Shah
10050 Penang
Telephone No. : (04) 228 2321
Facsimile No. : (04) 227 2391
Email: agriteum@streamyx.com
- REPORTING ACCOUNTANTS
FOR OUR GROUP AND
AUDITORS FOR OUR
COMPANY, IASB, IGSB AND
IUSB** : KPMG (AF 0758)
Chartered Accountants
1st Floor, Wisma Penang Garden
42, Jalan Sultan Ahmad Shah
10050 Penang
Telephone No. : (04) 227 2288
- AUDITORS FOR IMSB, ICSB
AND IVSB** : KCK & Associates (AF 1380)
Chartered Accountants
18-26-A2, Menara Gurney
Persiaran Gurney
10250 Penang
Telephone No. : (04) 370 7218
- AUDITORS FOR ISSB, IPMSB,
G&A, IISB, IFSB, ITSSB AND
SUNLINK** : Grant Thornton (AF 0042)
Chartered Accountants
51-8-A, Menara BHL Bank
Jalan Sultan Ahmad Shah
10050 Penang
Telephone No. : (04) 228 7828
- SOLICITORS FOR THE IPO** : Ong and Manecksha
Advocates & Solicitors
Suite 503, 5th Floor, Penang Plaza
Jalan Burma
10050 Penang
Telephone No : (04) 227 5811

CORPORATE DIRECTORY (Cont'd)

- PRINCIPAL BANKER** : Malayan Banking Berhad (3813-K)
Penang Business Centre
Suite 7 – 02, 7th Floor, Plaza MWE
No. 8, Lebuh Farquhar
10200 Penang
Telephone No. : (04) 261 5088
- INDEPENDENT BUSINESS AND
MARKET RESEARCH
CONSULTANTS** : Vital Factor Consulting Sdn Bhd (266797-T)
75C & 77C, Jalan SS22/19 Damansara Jaya
47400 Petaling Jaya
Selangor Darul Ehsan
Telephone No. : (03) 7728 0248
- INDEPENDENT REGISTERED
VALUERS** : Henry Butcher Malaysia (Penang) Sdn Bhd (177498-P)
142-M, Jalan Burma
10050 Penang
Telephone No. : (04) 229 8999
- : Henry Butcher Malaysia (Seberang Perai) Sdn Bhd (226881-H)
No. 2708, Jalan Chain Ferry Road
Kimsar Garden
13700 Prai
Penang
Telephone No. : (04) 397 5888
- ISSUING HOUSE** : Malaysian Issuing House Sdn Bhd (258345-X)
Level 6, Symphony House
Pusat Dagangan Dana 1
Jalan PJU 1A/46
47301 Petaling Jaya
Selangor Darul Ehsan
Telephone No. : (03) 7841 8000
- ADVISER, MANAGING
UNDERWRITER AND SOLE
PLACEMENT AGENT** : AmInvestment Bank Berhad (23742-V)
22nd Floor, Bangunan AmBank Group
55, Jalan Raja Chulan
50200 Kuala Lumpur
Telephone No. : (03) 2078 2633
- UNDERWRITER** : AmInvestment Bank Berhad (23742-V)
22nd Floor, Bangunan AmBank Group
55, Jalan Raja Chulan
50200 Kuala Lumpur
Telephone No. : (03) 2078 2633
- SHARIAH ADVISER** : AmInvestment Bank Berhad (23742-V)
22nd Floor, Bangunan AmBank Group
55, Jalan Raja Chulan
50200 Kuala Lumpur
Telephone No. : (03) 2078 2633
- LISTING SOUGHT** : Main Market of Bursa Securities
- SHARIAH STATUS** : Approved by the SAC

1. INFORMATION SUMMARY

THIS INFORMATION SUMMARY IS ONLY A SUMMARY OF THE SALIENT INFORMATION ABOUT OUR GROUP. YOU SHOULD READ AND UNDERSTAND THE WHOLE PROSPECTUS PRIOR TO DECIDING WHETHER OR NOT TO INVEST IN OUR SHARES. THE SUMMARY INFORMATION SET OUT BELOW IS DERIVED FROM THIS PROSPECTUS AND SHOULD BE READ IN CONJUNCTION WITH THE FULL TEXT OF THIS PROSPECTUS.

1.1 HISTORY AND BUSINESS

We were incorporated in Malaysia under the Act as a private limited company on 27 November 2004 under the name of Ivory Properties Group Sdn Bhd. Subsequently, on 14 March 2007, we converted into a public limited company and have since then assumed our present name.

Our principal activity is investment holding whilst our subsidiaries are principally involved in property development and related supporting services, and property management.

The history of our Group can be traced back to the incorporation of IASB in 1999 when our Group started to embark on the development of Tanjung Park. In 1999, ICSB, our associated company, was incorporated as a property development business unit of our Group. In 2004, ICSB signed an agreement with the landowner for the future development of Island Resort project.

In 1999, IMSB, focusing on property development was incorporated. In 2001, IMSB started to embark on the development of Moonlight Bay project. In 2000, when ISSB was incorporated as our Group's property development business unit, ISSB commenced the development of two (2) property projects, Palace Hill and Plaza Ivory.

In 2001, our Group incorporated IGSB, which is involved in property development. IGSB held approximately 13 acres of land and in 2004, IGSB started to embark on the development of Penang Times Square project. IVSB, our associated company, was incorporated in 2001 and is primarily involved in property development for The View Twin Towers project.

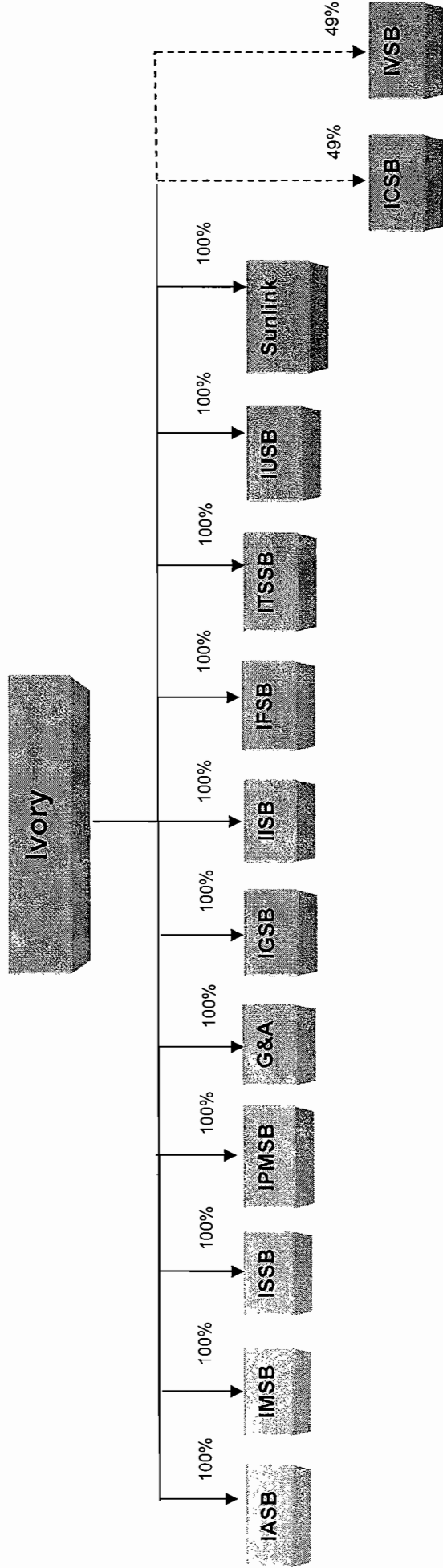
In 2002, IISB was incorporated as a property development business unit of our Group. IFSB was incorporated in 2003 to provide interior design services and interior fit-out, and renovation works. In 2007, ITSSB was incorporated and primarily focus on property management. In 2008, IUSB was incorporated to be principally involved in provision of utilities services whilst Sunlink was incorporated to undertake food services operations. Currently Sunlink operates two (2) franchised "Marry Brown" outlets in Penang.

Further details on our Group's history and business are set out in Section 4 of this Prospectus.

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1. INFORMATION SUMMARY (Cont'd)

The structure of our Group and our associated companies is as set out below:-



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1. INFORMATION SUMMARY (Cont'd)**1.2 PROMOTER, SUBSTANTIAL SHAREHOLDERS, DIRECTORS AND KEY MANAGEMENT**

Our Promoter, substantial shareholders, Directors and key management are as follows:-

Name	Designation
Promoter Dato' Low Eng Hock	Chairman/ Group Chief Executive Officer
Substantial Shareholders Dato' Low Eng Hock Ooi Choi Kiat.	Chairman/ Group Chief Executive Officer Non-Independent Non-Executive Director
Directors Dato' Low Eng Hock Dato' Seri Nazir Ariff Bin Mushir Ariff Loh Chin Chuen Ooi Choi Kiat Loh Chye Teik Dr Asairinachan @ Aravinachan A/L Kunjamboo Lim Hock Siu	Chairman/ Group Chief Executive Officer Deputy Chairman/ Executive Director Executive Director Non-Independent Non-Executive Director Independent Non-Executive Director Independent Non-Executive Director Independent Non-Executive Director
Key Management Dato' Ooi Chin Loo Lim Kin Lian Goh Chin Heng Zaida Binti Ayob Chow Kah Hoong Tan Kok Hwa Murly A/L Manokharan Yeong Siew Yan Kang Pee Thye Lee Saw Looi Lee Phaik Har Ching Ai Hooi Tan Mei Ling Lye Khuan Thye	Chief Operating Officer Chief Financial Officer Operations Director Director of Architecture Director of Engineering Project Director (Construction) Project Director (Design and Marketing) Project Director (Development and Design) Assistant Project Director (Construction) Senior Accounts Manager Senior Procurement Manager Senior Management Accountant Senior Contract Manager Senior Sales and Marketing Manager

Details of our Promoter, substantial shareholders, Directors and key management are set out in Section 5 of this Prospectus.

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1. INFORMATION SUMMARY (Cont'd)**1.3 SALIENT INFORMATION ON THE LISTING EXERCISE AND UTILISATION OF PROCEEDS**

The IPO entails a public issue of 44,899,000 new Shares and an offer for sale of 16,170,000 Shares at an IPO Price of RM1.00 per Share.

Our Group will utilise the total gross proceeds of approximately RM44.90 million arising from the Rights Issue and Public Issue in the following manner:-

	Expected Utilisation Period After Our Company's Listing	Amount	
		RM'000	%
(i) Repayment of bank borrowings	Within 6 months	10,000	22.27
(ii) Working capital	Within 12 months	31,499	70.16
(iii) Estimated share issue expenses	Within 6 months	3,400	7.57
Total proceeds		44,899	100.00

The Offer For Sale is expected to raise gross proceeds of RM16.17 million. The entire proceeds of the Offer For Sale, net of relevant fee, will accrue to the Offerors.

Further details on the IPO and utilisation of proceeds are set out in Sections 2.2 and 2.6 of this Prospectus respectively.

1.4 RISK FACTORS

In evaluating an investment in the IPO Shares, you should carefully consider all information contained in this Prospectus, including but not limited to the general and specific risks set out below.

1.4.1 Risks Relating to Our Group's Operations and Financial Performance, and Industry

- (i) We may be dependent on strategic location of land banks
- (ii) Our business may be affected should we delay in completion of projects
- (iii) Our business and operations may be affected by the cost of development for property projects and demand risks
- (iv) Property Overhang
- (v) We are exposed to competitive risks
- (vi) We are exposed to business and economic risks
- (vii) We may be affected by financial risks
- (viii) We are subject to borrowings covenants
- (ix) Political and government regulations and controls
- (x) We are exposed to the global financial crisis
- (xi) Our Group relies on key personnel and continued management
- (xii) Potential conflict of interest within our Group

1. INFORMATION SUMMARY (Cont'd)

- (xiii) Our insurance coverage may not be adequate for our operations
- (xiv) Achievability of proforma consolidated profit forecast by our Group
- (xv) Our operations may be affected by material litigation, claim or arbitration
- (xvi) Control by our Promoter

1.4.2 Risks Relating to the IPO

- (i) Payment of dividend
- (ii) Our Shares are subject to capital market risks, which could result in the value of your investment in our Shares to decline
- (iii) There may be a delay in our Listing or the Listing may be aborted
- (iv) There is no prior market for our Shares and an active market for our Shares may not develop
- (v) Disclosure regarding forward-looking statements

Further details of these risk factors are set out in Section 3 of this Prospectus.

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1. INFORMATION SUMMARY (Cont'd)**1.5 FINANCIAL HIGHLIGHTS****1.5.1 Historical Financial Information**

The summarised proforma consolidated results of our Company for the FYE 2005 to FYE 2009 have been prepared for illustrative purposes only based on the audited financial statements of the companies in our Group and on the assumption that the current structure of our Group has been in existence throughout the financial years under review.

The proforma consolidated results should be read in conjunction with the accompanying notes and assumptions included in the proforma consolidated financial information set out in Sections 10.11 and 10.12 of this Prospectus.

	Audited				
	FYE 2005	FYE 2006	FYE 2007	FYE 2008	FYE 2009
	RM'000	RM'000	RM'000	RM'000	RM'000
Revenue	61,915	77,673	109,615	154,250	121,017
Cost of sales	(39,614)	(35,756)	(57,865)	(99,359)	(71,678)
GP	22,301	41,917	51,750	54,891	49,339
Selling and distribution expenses	(550)	(1,061)	(1,746)	(1,701)	(906)
General and administrative expenses	(8,735)	(9,919)	(13,182)	(15,761)	(24,254)
Other operating expenses	(55)	-	-	-	-
Other operating income	646	636	1,604	1,683	4,347
Operating profits	13,607	31,573	38,426	39,112	28,526
Finance costs	(812)	(1,144)	(1,488)	(1,560)	(4,478)
PBT before share of results of associated companies	12,795	30,429	36,938	37,552	24,048
Share of results of associated companies	766	1,440	346	(277)	897
PBT	13,561	31,869	37,284	37,275	24,945
Taxation	(3,520)	(9,367)	(10,782)	(10,402)	(7,779)
PAT	10,041	22,502	26,502	26,873	17,166
Attributable to:-					
- Equity holders of Ivory	10,041	22,502	26,502	26,873	17,166
- Minority interest	-	-	-	-	-
No. of Shares in issue ('000) ^(a)	141,101	141,101	141,101	141,101	141,101
Gross EPS (sen)	9.61	22.59	26.42	26.42	17.68
Net EPS (sen)	7.12	15.95	18.78	19.05	12.17
Fully diluted EPS (sen)	7.12	15.95	18.78	19.05	12.17
EBITDA	15,458	34,191	40,167	40,743	32,676
Interest expense	812	1,144	1,488	1,560	4,478
Depreciation	1,085	1,178	1,395	1,908	3,253
GP margin (%)	36.02	53.97	47.21	35.59	40.77
PBT margin (%)	21.90	41.03	34.01	24.17	20.61
PAT margin (%)	16.22	28.97	24.18	17.42	14.18

Notes:-

- (a) Based on the issued and paid-up share capital of 141,100,859 Shares after the Subdivision and Acquisitions.
- (b) The financial results of the following subsidiaries have been time apportioned in order to be coterminous with the financial year end of our Company:-
- IPMSB for the financial year ended 30 June 2005 and financial period ended 31 December 2006;
 - IISB for the financial year ended 31 August 2005 and financial period ended 31 December 2006; and
 - IFSB for the financial period/ year ended 31 December 2005 and 2006.

The financial information of our Group is detailed in Section 10 of this Prospectus.

1. INFORMATION SUMMARY (Cont'd)**1.5.2 Proforma Consolidated Balance Sheets as at 31 December 2009**

The proforma consolidated balance sheets of Ivory as at 31 December 2009 as set out below has been prepared for illustrative purposes only to show the effects on the audited consolidated balance sheets of our Company, had the Listing Scheme and utilisation of proceeds been effected on that date.

	Audited as at 31 December 2009 RM'000	(I) After the Subdivision and Acquisitions RM'000	(II) After (I) and the Rights Issue RM'000	(III) After (II), Public Issue and Utilisation of Proceeds RM'000
Assets				
Property, plant and equipment	-	38,118	38,118	38,118
Investment properties	-	46,751	46,751	46,751
Land held for property development	-	26,277	26,277	26,277
Investment in associated companies	-	1,158	1,158	1,158
Other investments, at cost	-	53	53	53
Intangible assets	-	105	105	105
Goodwill on consolidation	-	448	448	448
Total non-current assets	-	112,910	112,910	112,910
Property development costs	-	140,951	140,951	140,951
Inventories	-	50,018	50,018	50,018
Trade and other receivables	304	56,267	56,267	56,267
Current tax assets	-	39	39	39
Cash and cash equivalents	^(a)	12,104	12,104	43,603
Total current assets	304	259,379	259,379	290,878
Total assets	304	372,289	372,289	403,788
Equity:				
Share capital	^(a)	70,550	70,550	93,000
(Accumulated losses)/ Retained profits	(1,057)	101,507	101,507	98,923
Share premium	-	680	680	22,313
Merger debit	-	(58,901)	(58,901)	(58,901)
Total equity	(1,057)	113,836	113,836	155,335
Liabilities				
Borrowings	-	77,106	77,106	77,106
Deferred tax liabilities	-	1,643	1,643	1,643
Total non-current liabilities	-	78,749	78,749	78,749
Trade and other payables	1,361	134,256	134,256	134,256
Borrowings	-	41,825	41,825	31,825
Current tax liabilities	-	3,623	3,623	3,623
Total current liabilities	1,361	179,704	179,704	169,704
Total liabilities	1,361	258,453	258,453	248,453
Total equity and liabilities	304	372,289	372,289	403,788
No. of Shares in issue ('000)	^(b)	141,101	141,101	186,000
NTA (RM'000)	(1,057)	113,283	113,283	154,782
NTA per ordinary share of RM1.00 each (RM)	(529)	N/A	N/A	N/A
NTA per Share (RM)	N/A	0.80	0.80	0.83
Total Borrowings	-	118,931	118,931	108,931
Gearing (Times)	-	1.04	1.04	0.70

Notes:-

(a) Denotes RM2.

(b) Denotes 2 ordinary shares of RM1.00 each.

1. INFORMATION SUMMARY (Cont'd)**1.5.3 Proforma Consolidated Profit Forecast**

Our proforma consolidated profit forecast for the FYE 2010 is as follows:-

FYE	Forecast 2010 RM'000
Revenue	181,671
Consolidated PBT	45,218
Taxation	(11,359)
Consolidated PAT	33,859
Enlarged issued and paid-up share capital ('000) ^(a)	186,000
- Gross EPS (sen) ^(b)	24.31
- Net EPS (sen) ^(c)	18.20
Gross PE Multiple (times) ^{(b)(d)}	4.11
Net PE Multiple (times) ^{(c)(d)}	5.49

Notes:-

- (a) Based on our enlarged issued and paid-up share capital of 186,000,000 Shares after the IPO.
- (b) Based on the consolidated PBT.
- (c) Based on the consolidated PAT.
- (d) Based on the IPO Price.

Detailed information on the proforma consolidated profit forecast is set out in Sections 10.6 and 10.7 of this Prospectus.

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1. INFORMATION SUMMARY (Cont'd)**1.5.4 Proforma Consolidated NTA as at 31 December 2009**

	After Adjusting for the Subdivision, Acquisitions, Rights Issue, IPO and Utilisation of Proceeds*	
	Illustration I	Illustration II
Proforma consolidated NTA (RM'000)	154,782	225,841
NTA per Share (RM)	0.83	1.21

Note:-

* After deducting the estimated share issue expenses of approximately RM3.40 million. Please refer to Section 2.6 of this Prospectus for details on the estimated share issue expenses.

The above proforma consolidated NTA is based on the enlarged issued and paid-up share capital of 186,000,000 Shares in our Company.

Detailed calculations of the proforma consolidated NTA are set out in Section 10.12 of this Prospectus.

The proforma consolidated NTA per Share under the Merger Method of Accounting (denoted as Illustration I) compared with proforma consolidated NTA after taking into consideration the revaluation surplus (net of deferred taxation) (denoted as Illustration II) as mentioned above and the respective price to book ratio are as follows:-

	Illustration I	Illustration II
NTA (RM'000)	154,782	225,841
NTA per Share* (RM)	0.83	1.21
IPO Price (RM)	1.00	1.00
Premium/ (Discount) of IPO Price over NTA (RM)	0.17	(0.21)
Price to book ratio (times)	1.20	0.83

Note:-

* Based on the enlarged issued and paid-up share capital of 186,000,000 Shares in our Company.

Illustration I

The IPO Price of RM1.00 per Share represents a premium of approximately RM0.17 or approximately 20.48% over our Company's proforma consolidated NTA per Share (under the Merger Method of Accounting) of approximately RM0.83. Based on the proforma consolidated NTA of approximately RM0.83 per Share and the IPO Price of RM1.00 per Share, it would give our Company a price to book ratio of approximately 1.20 times.

1. INFORMATION SUMMARY (Cont'd)

Illustration II

The IPO Price of RM1.00 per Share represents a discount of approximately RM0.21 or approximately 17.36% over our Company's proforma consolidated NTA per Share (after taking into consideration the revaluation surplus and net of deferred taxation) of approximately RM1.21. Based on the proforma consolidated NTA of approximately RM1.21 per Share and the IPO Price of RM1.00 per Share, it would give our Company a price to book ratio of approximately 0.83 times.

1.6 AUDIT QUALIFICATIONS

None of the financial statements of the companies within our Group for the FYE 2005 to FYE 2009 were subject to any audit qualification.

1.7 SHARIAH STATUS

We have voluntarily submitted an application to the SC for a Shariah compliance review to be carried out by the SAC as part of the process of determining our Shariah status at IPO.

The SAC has classified our securities as Shariah-compliant based on the audited financial statements for the financial year ended 31 December 2009 and the Shariah criteria adopted by the SAC.

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2. PARTICULARS OF THE IPO

This Prospectus is dated 12 July 2010. The IPO is subject to the terms and conditions of this Prospectus.

A copy of this Prospectus has been registered with the SC and lodged with the ROC who takes no responsibility for its contents.

The approval of the SC for the IPO, as set out in Section 6 of this Prospectus, shall not be taken to indicate that the SC recommends the IPO. You should rely on your own evaluation to assess the merits and risks of the IPO.

Bursa Securities has resolved to approve our admission to the Official List of the Main Market of Bursa Securities and the listing of and quotation for our entire enlarged issued and paid-up share capital of RM93,000,000 comprising 186,000,000 Shares on the Main Market of Bursa Securities, vide its letter dated 6 May 2010. Listing of and quotation for our Shares will commence after, amongst others, receipt of confirmation from Bursa Depository of the receipt of allotment and allocation information for the crediting of the IPO Shares, and receipt of an undertaking that all notices of allotment will be issued and despatched to all successful applicants prior to the date of listing of and quotation for the Shares, failing which any allotment and allocation made on an Application to subscribe for and/or purchase of our Shares pursuant to this Prospectus is required under Malaysian law to be void.

The acceptance of Applications for the IPO Shares is conditional upon permission being granted by Bursa Securities for the listing of and quotation for the entire enlarged issued and paid-up share capital of our Company on the Main Market of Bursa Securities. Accordingly, all monies paid in respect of any Application accepted will be returned without interest to the applicants if the aforesaid permission is not granted within six (6) weeks from the date of issue of this Prospectus (or such longer period as may be specified by the SC) provided that we are notified by Bursa Securities within the aforesaid timeframe. If such monies are not repaid within fourteen (14) days after we become liable to do so, the provision of sub-Section 243(2) of the CMSA shall apply accordingly.

Pursuant to Section 14(1) of the Central Depositories Act, Bursa Securities has prescribed our Shares as a Prescribed Security. In consequence thereof, our Shares offered through this Prospectus will be deposited directly with Bursa Depository and any dealings in these Shares will be carried out in accordance with the Central Depositories Act and the Rules. We will not issue any share certificates to successful applicants. Please note that Bursa Depository or its nominee will be entered in the register of members of our Company as the registered holder of the entire issued share capital of our Company as joint-holder with the Depositors.

Person(s) submitting Application(s) by way of Application Form or by way of Electronic Share Application or Internet Share Application must have a CDS Account. If you do not have a CDS Account, you may open one (1) by contacting any of the ADAs listed in Section 16.10 of this Prospectus. In the case of an Application by way of Application Form, an applicant should state his CDS Account number in the space provided in the Application Form. In the case of an Application by way of Electronic Share Application or Internet Share Application, only an applicant who is an individual and has a CDS Account can make an Application. A corporation or institution cannot apply to subscribe for and/or purchase of the IPO Shares by way of Electronic Share Application or Internet Share Application.

Pursuant to the Listing Requirements, at least 25% of our total number of Shares for which listing is sought must be held by at least 1,000 public shareholders holding not less than 100 Shares each at the point of our Listing. In the event that the above requirement is not met, we may not be allowed to proceed with our Listing on the Main Market of Bursa Securities. In the event thereof, monies paid in respect of all Applications will be returned if the said permission is not granted.

2. PARTICULARS OF THE IPO (Cont'd)

The SC and Bursa Securities assume no responsibility for the correctness of any statements made or opinions or report expressed in this Prospectus. Admission to the Official List of the Main Market of Bursa Securities is not to be taken as an indication of our merit or the merit of our Shares.

No person is authorised to give any information or to make any representation not contained herein in connection with the IPO and if given or made, such information or representation must not be relied upon as having been authorised by us. Neither the delivery of this Prospectus nor any IPO made in connection with this Prospectus shall, under any circumstances, constitute a representation or create any implication that there has been no change in our affairs since the date hereof.

Nonetheless, should we become aware of any subsequent material change or development affecting a matter disclosed in this Prospectus that arise from the date of issue of this Prospectus up to the date of Listing, we shall issue a supplemental or replacement prospectus, as the case may be, in accordance with the provisions of Section 238 of the CMSA.

The distribution of this Prospectus and the making of the IPO in certain other jurisdictions outside Malaysia may be restricted by law. The distribution of this Prospectus and the sale of any part of the IPO Shares are subject to Malaysian laws and the Company and the Offerors, together with the Adviser, Sole Underwriter and Sole Placement Agent, take no responsibility for the distribution of this Prospectus and the offer of any part of the IPO Shares outside Malaysia, which may be restricted by law in certain other jurisdictions. Persons who may come into possession of this Prospectus are required to inform themselves of and to observe such restrictions. This Prospectus does not constitute and may not be used for the purpose of an invitation to subscribe for and/or purchase the IPO Shares in any jurisdiction in which such offer or invitation is not authorised or lawful or to any person to whom it is unlawful to make such offer or invitation.

If you are in doubt concerning this Prospectus, you should consult your stockbroker, bank manager, solicitor, accountant, or other professional advisers.

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2. PARTICULARS OF THE IPO (Cont'd)

2.1 PURPOSES OF THE IPO

The purposes of the IPO are as follows:-

- (i) To provide the opportunity for the eligible Directors, employees and business associates of our Group and the Malaysian investing public and institutions to participate in the equity and continuing growth of our Group;
- (ii) To comply with the National Development Policy requirements in respect of Bumiputera equity participation in our Group;
- (iii) To enable our Group to gain recognition and certain stature through its listing status and further enhance its corporate reputation and assist our Group in expanding its customer base;
- (iv) To provide additional funds to meet the present and future working capital requirement of our Group;
- (v) To enable our Group to gain access to the capital market to raise funds for future expansion, diversification, modernisation and continued growth; and
- (vi) To obtain the listing of and quotation for the entire enlarged issued and paid-up share capital of Ivory on the Main Market of the Bursa Securities.

2.2 DETAILS OF THE IPO

We (for ourselves and on behalf of the Offerors) will undertake the Public Issue and Offer For Sale in conjunction with and as an integral part of our Listing, as follows:-

(i) Public Issue

Our Company will issue 44,899,000 new Shares at an issue price of RM1.00 per Share. The Public Issue Shares shall be payable in full on application upon the terms and conditions as set out in this Prospectus and will be allocated and allotted in the manner set out below:-

(a) Malaysian Public

9,300,000 Public Issue Shares, representing 5.0% of our enlarged issued and paid-up share capital, to be allocated via balloting, will be made available for application by the Malaysian Public, of which at least 50% is to be set aside strictly for Bumiputera individuals, companies, societies, co-operatives and institutions.

(b) Eligible Directors, Employees and Business Associates of our Group

1,000,000 Public Issue Shares, representing approximately 0.54% of our enlarged issued and paid-up share capital will be reserved for the eligible Directors, employees and business associates (which include the suppliers, sales agents, customers and others) of our Group.

2. PARTICULARS OF THE IPO (Cont'd)

The Pink Form Shares have been allocated to four (4) eligible Directors and one hundred and eighty five (185) employees of our Group based on the following criteria as approved by our Board:-

- At least eighteen (18) years old;
- Job position;
- Length of service; and
- Performance.

Details of the Pink Form Shares allocation to the eligible Directors, employees and business associates of our Group are as follows:-

Directors

Name of Directors	Designation	Pink Form Shares Allocation
Loh Chin Chuen	Executive Director	50,000
Loh Chye Teik	Independent Non-Executive Director	20,000
Dr Asaininchan @ Aravinchan A/L Kunjamboo	Independent Non-Executive Director	20,000
Lim Hock Siu	Independent Non-Executive Director	20,000
Total		110,000

Employees and Business Associates

Category	Number	Pink Form Shares Allocations
Management and professionals	27	210,000
Executive/ Officer	29	63,000
Sales and marketing	13	36,000
Technical and supervisory	97	238,000
Clerical and administrative	19	41,000
Total eligible employees	185	588,000
Business associates	33	302,000
Total eligible employees and business associates	218	890,000

However, the above Pink Form Shares allocation is subject to the eligible Directors, employees and business associates subscribing to their respective allocations.

(c) Bumiputera Investors

570,000 Public Issue Shares, representing approximately 0.31% of our enlarged issued and paid-up share capital will be reserved for Bumiputera investors approved by MITI.

2. PARTICULARS OF THE IPO (Cont'd)

(d) Private Placement

34,029,000 Public Issue Shares, representing approximately 18.30% of our enlarged issued and paid-up share capital are reserved by way of Private Placement to selected investors (who are deemed public).

All the new Shares to be issued pursuant to the Public Issue shall, upon allotment and issue, and when fully paid, rank *pari passu* in all respect with our existing issued and paid-up Shares, except that the Public Issue Shares will not be entitled to any dividends, rights, allotments or other distributions declared, made or paid prior to the date of allotment and issue of the Public Issue Shares.

There is no minimum subscription amount to be raised from the Public Issue.

(ii) Offer For Sale

Concurrent with the Public Issue, the Offerors will offer for sale 16,170,000 Shares, representing approximately 8.69% of our enlarged issued and paid-up share capital at the offer price of RM1.00 per Share, payable in full on application upon such terms and conditions as set out in this Prospectus. Such Offer Shares will be reserved for Bumiputera investors approved by MITI. Details of the Offerors are as set out below:-

No	Offeror	Address	Relationship with Our Group	Shareholdings Before IPO ^(a)		Offer Shares			Shareholdings After IPO ^(b)	
				No. of Shares	%	No. of Shares	% Before IPO ^(a)	% After IPO ^(b)	No. of Shares	%
1.	Dato' Low Eng Hock	2182-D, Lorong Kampung Pisang 05100 Alor Setar Kedah	Dato' Low Eng Hock is our Chairman/ Group Chief Executive Officer, Promoter and substantial shareholder. He is also the Director and substantial shareholder (directly prior to the Acquisitions and indirectly after the Acquisitions by virtue of his shareholding of not less than 15% in our Company as disclosed in Section 4.1.3 of this Prospectus) in IASB, IMSB, ISSB, IPMSB, G&A, IGSB, IISB, IFSB, ITSSB, IUSB, Sunlink, ICSB and IVSB	103,611,704	73.43	6,000,138	4.25	3.22	97,611,566	52.48
2.	Ooi Choi Kiat	27, Jalan Ibu Kota 8 Taman Ibu Kota 53100 Kuala Lumpur	Ooi Choi Kiat is our Non-Independent Non-Executive Director and substantial shareholder. He is also a Director of IASB and IPMSB. He was a substantial shareholder of IASB and IPMSB prior to the Acquisitions	16,934,332	12.00	2,000,000	1.42	1.08	14,934,332	8.03

2. PARTICULARS OF THE IPO (Cont'd)

No	Offeror	Address	Relationship with Our Group	Shareholdings Before IPO ^(a)		Offer Shares			Shareholdings After IPO ^(b)	
				No. of Shares	%	No. of Shares	% Before IPO ^(a)	% After IPO ^(b)	No. of Shares	%
3.	Dato' Tan Yew Thong	1, Gat Lebu Macallum 10300 Georgetown Penang	Dato' Tan Yew Thong was a substantial shareholder of IGSB prior to the Acquisitions	12,254,233	8.68	3,804,840	2.70	2.05	8,449,393	4.54
4.	Othaman @ Osman Bin Kallahan	2A-25-02, The View Condominium Jalan Batu Uban 5 11700 Batu Uban Gelugor Penang	Othaman @ Osman Bin Kallahan was a substantial shareholder of IMSB, IGSB and IFSB prior to the Acquisitions	6,139,294	4.35	4,279,294	3.03	2.30	1,860,000	1.00
5.	Dato' Teh Yeong Keat	3, Jalan Piggot 10450 Georgetown Penang	Dato' Teh Yeong Keat was a substantial shareholder of ISSB and IFSB prior to the Acquisitions	1,430,030	1.01	82,813	0.06	0.04	1,347,217	0.72
6.	Loh Chin Chuen	15-1-7, Desa Embun Emas Apartment Lorong Sungai Kelian 11200 Tanjung Bungah Penang	Loh Chin Chuen is our Executive Director and a Director of IASB, IMSB, ISSB, IPMSB, G&A, IGSB, IISB, IFSB, ITSSB, IUSB and Sunlink, and Alternate Director to Dato' Low Eng Hock in ICSB. He was also a substantial shareholder of G&A, IISB, ITSSB, IUSB and Sunlink prior to the Acquisitions	29,895	0.02	1,730	^(c)	^(c)	^(d) 78,165	0.04
7.	Chow Kah Hoong	No. 320-J, Jalan Perak 11600 Georgetown Penang	Chow Kah Hoong is a key management of Ivory and the Director of G&A. He was also a substantial shareholder of G&A prior to the Acquisitions	20,458	0.01	1,185	^(c)	^(c)	^(d) 29,273	0.02
	Total			140,419,946	99.52	16,170,000	11.46	8.69	124,309,946	66.83

Notes:-

- (a) Based on our issued and paid-up share capital of up to 141,101,000 Shares after the Subdivision, Acquisitions and Rights Issue.
- (b) Based on our enlarged issued and paid-up share capital of up to 186,000,000 Shares after the IPO.
- (c) Immaterial.
- (d) Including their respective entitlements for the Pink Form Shares allocation pursuant to the IPO.
- (e) Total does not add up due to rounding.

2. PARTICULARS OF THE IPO (Cont'd)

(iii) Underwriting and Allocation of the IPO Shares

All the 10,300,000 Public Issue Shares made available for application by the Malaysian Public and the eligible Directors, employees and business associates of our Group under Sections 2.2(i)(a) and 2.2(i)(b) respectively of this Prospectus have been fully underwritten.

The 34,029,000 Public Issue Shares to be allocated by way of Private Placement to selected investors (who are deemed public) under Section 2.2(i)(d) of this Prospectus are not underwritten as irrevocable undertakings have been obtained from the selected investors to take up the Public Issue Shares available under the Private Placement.

The 16,740,000 IPO Shares made available for application by Bumiputera investors approved by MITI under Sections 2.2(i)(c) and 2.2(ii) of this Prospectus are not underwritten as these IPO Shares have been allocated for MITI's approved and recognised Bumiputera investors whereby irrevocable undertakings from the Bumiputera investors have been obtained.

The allocations of the IPO Shares shall take into account the desirability of distributing the IPO Shares to a reasonable number of applicants with a view of broadening our Company's shareholding base to meet the public spread requirements of Bursa Securities and to establish a liquid and adequate market for our Company's Shares.

In the event of an under-subscription of the IPO Shares by the Malaysian Public, the unsubscribed IPO Shares will be made available to selected investors via private placement and vice versa.

The IPO Shares which are not taken up by the relevant categories of persons will be made available for application by persons in other categories. Thereafter, any remaining IPO Shares that are not subscribed for will then be subscribed by the Underwriter based on the terms of the Underwriting Agreement.

2.3 DILUTION

Dilution is the amount by which the IPO Price to be paid by the applicants/ new investors for our Shares under the IPO exceeds our proforma consolidated NA per Share after the IPO. The proforma consolidated NA as at 31 December 2009 based on our issued and paid-up share capital of up to 141,101,000 Shares before adjusting for the effects of the Public Issue and utilisation of proceeds is approximately RM0.81 per Share for Illustration I and RM1.31 per Share for Illustration II.

Pursuant to the Public Issue of 44,899,000 new Shares at the IPO Price of RM1.00 per Share and after adjusting for the effects of the utilisation of proceeds, the proforma consolidated NA of our Group as at 31 December 2009 would increase to approximately RM0.84 per Share for Illustration I and decrease to approximately RM1.22 per Share for Illustration II based on our enlarged issued and paid-up capital of up to 186,000,000 Shares after the IPO. For Illustration I, this represents an immediate increase in adjusted NA of approximately RM0.03 per Share to our existing shareholders and dilution of approximately RM0.16 per Share, representing approximately 16.0% of immediate dilution to our new investors. For Illustration II, this represents an immediate dilution in adjusted NA of approximately RM0.09 per Share to our existing shareholders and a discount of approximately RM0.22 per Share, representing approximately 22.0% of immediate discount to our new investors.

2. PARTICULARS OF THE IPO (Cont'd)

The following table illustrates such dilution on a per Share basis:-

	Illustration I	Illustration II
	RM	RM
IPO Price	1.00	1.00
Proforma consolidated NA per Share as at 31 December 2009 before the IPO	0.81	1.31
Increase in proforma consolidated NA per Share contributed by new investors	0.03	(0.09)
Proforma consolidated NA per Share after the IPO	0.84	1.22
Dilution per Share to new investors	0.16	(0.22)

The following table summarises the total number of Shares acquired and the total consideration paid by our substantial shareholders, Directors and key management or persons connected including those by the new investors pursuant to the IPO during the past three (3) years prior to the date of this Prospectus:-

	Date	No. of Shares Acquired	No. of Shares After Acquisitions and Rights Issue	Consideration (RM)	Average Price Per Share (RM)
Dato' Low Eng Hock	11.03.2010	^(a) 103,611,596	103,611,596	125,370,029	1.21
	15.03.2010	^(b) 104	103,611,700	126	1.21
	16.03.2010	^(c) 4	103,611,704	2	0.50
Ooi Choi Kiat	11.03.2010	^(a) 16,934,315	16,934,315	20,490,522	1.21
	15.03.2010	^(b) 17	16,934,332	21	1.21
Dato' Seri Nazir Ariff Bin Mushir Ariff	11.03.2010	^(a) 681,053	681,053	824,075	1.21
	15.03.2010	^(b) 1	681,054	1	1.21
Loh Chin Chuen	11.03.2010	^(a) 29,895	29,895	36,173	1.21
Chow Kah Hoong	11.03.2010	^(a) 20,458	20,458	24,754	1.21
<u>New Investors</u>					
- Public Issue	Not applicable	-	44,899,000	44,899,000	1.00
- Offer For Sale	Not applicable	-	16,170,000	16,170,000	1.00

Notes:-

- (a) Pursuant to the Acquisitions.
(b) Pursuant to the Rights Issue.
(c) Pursuant to the transfer of 4 subscribers' Shares.

2. PARTICULARS OF THE IPO (Cont'd)

2.4 BASIS OF ARRIVING AT THE IPO PRICE

The IPO Price is RM1.00 per Share. The price was determined and agreed upon by our Company and AmInvestment Bank as the Adviser and Managing Underwriter, based on various factors which include:-

- (i) our Group's operating and financial history and position as outlined below:-
 - (a) our experience in Property Development of approximately eleven (11) years;
 - (b) our Group's business model for being an integrated property developer focusing on the premium market for residential and commercial properties;
 - (c) as an integrated property developer, we have the in-house capabilities to undertake the full aspect of property development;
 - (d) our Group's property development projects which are located in Penang Island, Mainland Penang and Tanjung Malim; and
 - (e) our Group's historical proforma consolidated PAT of approximately RM10.04 million, RM22.50 million, RM26.50 million, RM26.87 million and RM17.17 million for FYE 2005, FYE 2006, FYE 2007, FYE 2008 and FYE 2009 respectively representing historical net EPS of approximately 5.40 sen, 12.10 sen, 14.15 sen, 14.45 sen and 9.23 sen (based on our issued and paid-up share capital of 186,000,000 Shares after the Public Issue) for FYE 2005, FYE 2006, FYE 2007, FYE 2008 and FYE 2009 respectively.

For further details on our Group's operating and financial history and position, please refer to Sections 4 and 10 of this Prospectus respectively;

- (ii) our competitive strengths and advantages in terms of:-
 - (a) established track record and market reputation;
 - (b) in-house architecture and design facilities;
 - (c) integrated property developer;
 - (d) strategic locations of developments;
 - (e) standards of quality;
 - (f) faster to market; and
 - (g) price appreciation of our Group's properties.

For further details on our competitive strengths and advantages, please refer to Section 4.5 of this Prospectus;

2. PARTICULARS OF THE IPO (Cont'd)

(iii) our future plans, strategies and prospects in the aspect of:-

- (a) new property developments in Penang; and
- (b) geographical expansion.

For further details on our future plans, strategies and prospects, please refer to Section 4.19 of this Prospectus;

(iv) our forecast net PE Multiple of approximately 5.49 times based on the forecast net EPS of approximately 18.20 sen based on the enlarged issued and paid-up share capital of 186,000,000 Shares in our Company;

(v) (a) our proforma consolidated NTA per Share as at 31 December 2009 of approximately RM154.78 million or approximately RM0.83 per Share. Based on our enlarged issued and paid-up share capital of 186,000,000 Shares, the IPO Price of RM1.00 per Share represents a premium of approximately RM0.17 per Share or approximately 20.48% to the proforma consolidated NTA per Share and a price to book ratio of approximately 1.20 times;

(b) Based on the market value of our Group's properties appraised by the independent registered valuers, Henry Butcher Malaysia (Penang) Sdn Bhd and Henry Butcher Malaysia (Seberang Perai) Sdn Bhd, there is a total revaluation surplus (net of deferred taxation) of approximately RM71.06 million as at 30 April 2008 (the details are set out in note (n) in Section 8.1.1, note (g) in Section 8.1.2(i) and note (e) in Section 8.1.2(iii) of this Prospectus). Consistent with the Merger Method of Accounting adopted for the acquisition of all the subsidiaries except for ITSSB, IUSB and Sunlink of which purchase consideration was via cash, no revaluation surplus will be incorporated in the financial statements of our Group. After taking into consideration the mentioned revaluation surplus of approximately RM71.06 million, our proforma consolidated NTA after the Subdivision, Acquisitions, Rights Issue, IPO and utilisation of proceeds will be approximately RM225.84 million or approximately RM1.21 per Share. As such, the IPO price of RM1.00 per Share represents a discount of approximately RM0.21 per Share or approximately 17.36% to the said NTA per Share and a price to book ratio of approximately 0.83 times;

(v) Our Promoter who has approximately twenty five (25) years of experience in the Property Development Industry; and

(vi) The prevailing market conditions and outlook of the Property Development Industry due to strong indications that economic conditions in Malaysia are improving and the outlook for the medium term would be better compared to 2009. For further details on the prevailing market conditions and outlook of the Property Development Industry, please refer to Section 4.18 of this Prospectus.

2. PARTICULARS OF THE IPO (Cont'd)

Our Directors and the Offerors are of the opinion that the IPO Price is fair and reasonable after careful consideration of the abovementioned factors.

However, you should note that the market price of our Shares upon listing on Bursa Securities is subject to the vagaries of market forces and other uncertainties which may affect the price of the Shares when they are traded.

You should bear in mind the risk factors as set out in Section 3 of this Prospectus and form your own views on the valuation of the IPO Shares and the reasonableness of the bases used before deciding to invest in our Shares.

2.5 SHARE CAPITAL

As at the date of this Prospectus, our issued and paid-up share capital is RM70,550,500 comprising 141,101,000 Shares.

Upon the allotment and issue of the Public Issue Shares pursuant to our IPO, our enlarged issued and paid-up share capital will be RM93,000,000 comprising 186,000,000 Shares as follows:-

	No. of Shares	Share Capital (RM)
Authorised share capital	200,000,000	100,000,000
Existing issued and paid-up share capital	141,101,000	70,550,500
New shares to be issued pursuant to the Public Issue	44,899,000	22,449,500
Enlarged issued and paid-up share capital upon Listing	186,000,000	93,000,000
Offer For Sale	16,170,000	8,085,000
IPO Price per Share	RM1.00	
Market Capitalisation (based on the IPO Price and our enlarged issued and paid-up share capital)	RM186,000,000	

The IPO Price is payable in full upon application, subject to the terms and conditions of this Prospectus.

As at the date of this Prospectus, our Company has only one (1) class of shares, being ordinary shares of RM0.50 each, all of which rank *pari passu* with one another. The Public Issue Shares will rank *pari passu* in all respects with the other existing shares, including voting rights and rights to all dividends and distributions that may be declared subsequent to the date of allotment thereof.

Subject to any special rights attached to any shares which our Company may issue in the future, the holders of Shares in our Company shall, in proportion to the amount paid-up on the Shares held by them, be entitled to share in the whole of the profits paid out by our Company as dividends and other distributions, and in respect of any surplus in the event of the liquidation of our Company, in accordance with our Company's Articles of Association.

2. PARTICULARS OF THE IPO (Cont'd)

At every general meeting, each member entitled to vote may vote in person or by proxy or by attorney or by duly authorised representative (in the case of a member who is a corporation). On a show of hands, every person who is a member or proxy or attorney or representative of a member shall have one (1) vote; and on a poll, every member present in person or by proxy or attorney or representative shall have one (1) vote for each share he holds. A member shall not be entitled to appoint more than two (2) proxies to attend and vote at the same meeting.

2.6 UTILISATION OF PROCEEDS

In summary, the gross proceeds of RM44.90 million which will accrue to our Company from the Rights Issue and Public Issue are proposed to be utilised in the following manner:-

	Expected Utilisation Period After Our Company's Listing	*Amount	
		RM'000	%
(i) Repayment of bank borrowings	Within 6 months	10,000	22.27
(ii) Working capital	Within 12 months	31,499	70.16
(iii) Estimated share issue expenses	Within 6 months	3,400	7.57
Total proceeds		44,899	100.00

Note:-

* The proceeds will be placed with licensed financial institutions until eventual utilisation.

(i) Repayment of Bank Borrowings

Our Group shall set aside RM10.0 million of the proceeds for the repayment of our Group's bank borrowings.

As at 31 December 2009, our Group's total bank borrowings are approximately RM118.93 million.

The allocation for the repayment of our Group's bank borrowings is as set out below:-

Type of Facility	Interest Rate/ Terms of Repayment	Purpose	Outstanding Amount as at 31 December 2009 RM'000	Repayment of Bank Borrowings RM'000	Outstanding Amount After Repayment RM'000
Term Loan	BLR + 2.25% per annum/ RM208,333 per month for 5 years commencing from March 2009 to February 2014	Purchase of land*	10,417	5,000	5,417
Bridging Loan	BLR + 1.75% per annum/ Annual review and to be fully settled subject to the completion of the individual phases of the Penang Times Square project via redemption of each unit release/ sold/ transferred or by 31 December 2013, whichever is earlier	Working capital	48,237	5,000	43,237
Total			58,654	10,000	48,654

2. PARTICULARS OF THE IPO (Cont'd)

Note:-

- * Purchase of land at GM 2565, Geran Nos. 1002, 1003, 1005, 1009, 1010, 82900, 82901, 1031 and 1072, all of Mukim Hulu Bernam Timur, Daerah Batang Padang, Negeri Perak for RM25.0 million from Mawar Hebat Sdn Bhd on 9 January 2009 in respect of Ivory Eco Park @ Tanjung Malim project. Please refer to Sections 8.1.2(iii), item no. 2 and 8.2 of this Prospectus for further details.

Such borrowings have been utilised to finance, inter alia, the purchase of land bank for the development by our Group, the working capital requirements of our Group, which include the payment of creditors, purchase of raw materials/ stocks and operating expenses.

The repayment of such borrowings will reduce our Group's gearing level from approximately 1.04 times to 0.70 times (based on our Group's proforma total borrowings and shareholders' funds as at 31 December 2009 after taking into consideration the Subdivision, Acquisitions, Rights Issue, IPO and utilisation of proceeds). At the prevailing average interest rate of approximately 7.30% per annum, our Group would be able to save interest cost of approximately RM0.73 million per annum.

(ii) Working Capital

Of the total proceeds, approximately RM31.50 million will be used as general working capital for our Group including the payment of creditors such as sub-contractors and consultants, salaries, purchase of raw materials, operating and marketing expenses as detailed below:-

No.	Description of Working Capital	Estimated Amount RM'000
1.	Payment of creditors	10,000
2.	Purchase of raw materials	15,000
3.	Operating and marketing expenses (including salaries)	6,499
	Total	31,499

(iii) Estimated Share Issue Expenses

The estimated listing expenses for our Listing are as follows:-

Estimated Share Issue Expenses	Amount RM'000
Fees to authorities	156
Professional fees ^(a)	1,000
Underwriting, placement fees, brokerage fees, printing, advertising and other miscellaneous expenses ^(b)	2,244
Total	^(c)3,400

Notes:-

- (a) Include fees for amongst others, the Adviser, Reporting Accountants, Solicitors, Independent Business and Market Research Consultants, Issuing House and other professional advisers.
- (b) Other incidental or related expenses in connection with the IPO.
- (c) If the actual share issue expenses are higher than budgeted, a portion of the amount allocated for working capital purposes will be utilised to fund the deficit. Conversely, if the actual share issue expenses are lower than budgeted, the excess will be utilised for working capital purposes.

2. PARTICULARS OF THE IPO (Cont'd)

We will bear all expenses and fees incidental to the listing of and quotation for our entire enlarged issued and paid-up share capital on the Main Market of Bursa Securities, which include underwriting commission, placement fees, brokerage, professional fees, authorities' fees, advertising and other fees. The aggregate expenses are estimated to be approximately RM3.40 million.

The Offer For Sale is expected to raise gross proceeds of approximately RM16.17 million. This amount shall accrue entirely to the Offerors and no part of the proceeds is receivable by our Company. The Offerors shall bear all expenses such as brokerage, stamp duty, registration and share transfer fees relating to the Offer Shares estimated to be approximately RM0.49 million.

2.7 FINANCIAL IMPACT FROM UTILISATION OF PROCEEDS

Our utilisation of the proceeds from the IPO is expected to have a financial impact on our Group as follows:-

(i) Enhancement of working capital

We will utilise approximately RM31.50 million of the Rights Issue and Public Issue proceeds for our working capital requirements, which includes the payment of creditors such as sub-contractors and consultants, salaries, purchase of raw materials, operating and marketing expenses. Our cash and cash equivalent balance will be increased to approximately RM43.60 million after the Listing. This will allow us to reduce the use of external funding to finance our daily operational activities.

(ii) Interest savings

The utilisation of the Rights Issue and Public Issue proceeds by our Group is expected to result in interest savings. The repayment of RM10.0 million of borrowings will reduce our Group's gearing level from approximately 1.04 times to 0.70 times (based on our Group's proforma total borrowings and shareholders' funds as at 31 December 2009 after taking into consideration the Subdivision, Acquisitions, Rights Issue, IPO and utilisation of proceeds as disclosed in Section 1.5.2 of this Prospectus). At the prevailing interest rate of approximately 7.30% per annum, our Group would be able to save interest cost of approximately RM0.73 million per annum.

2.8 UNDERWRITING COMMISSION, PLACEMENT FEE AND BROKERAGE**(i) Placement Fee**

We will pay the Sole Placement Agent a placement fee at the rate of 2.0% of the value of the Public Issue Shares reserved for the Private Placement under Section 2.2(i)(d) of this Prospectus (being the number of Public Issue Shares reserved for the Private Placement multiplied by the IPO Price) to be placed out successfully by our Sole Placement Agent.

2. PARTICULARS OF THE IPO (Cont'd)

(ii) Underwriting Commission

We will pay the Underwriter an underwriting commission at the rate of 2.0% of the value of the total underwritten Public Issue Shares made available for application by the Malaysian public and the eligible Directors, employees and business associates of our Group under Sections 2.2(i)(a) and 2.2(i)(b) respectively of this Prospectus (being the number of underwritten Public Issue Shares multiplied by the IPO Price).

(iii) Brokerage Fee

We will pay the brokerage fee to be incurred on the sale of the 9,300,000 Public Issue Shares at the rate of 1.0% of the IPO Price per Share in respect of successful applications by the Malaysian public which bear the stamp of member companies of Bursa Securities, members of the Association of Banks in Malaysia, members of the Malaysian Investment Banking Association and/or MIH.

2.9 SALIENT TERMS OF THE UNDERWRITING AGREEMENT

The salient clauses of the Underwriting Agreement dated 21 April 2010 entered into between our Company, the Managing Underwriter and the Underwriter ("**Agreement**"), which may allow the Managing Underwriter and/or Underwriter to withdraw from its obligations under the agreement after the IPO as extracted from the Agreement, are set out below.

Unless otherwise stated, all capitalised terms herein shall bear the same meanings as prescribed in the Agreement.

"TERMINATION

Subject to clause 14.3 of the Agreement but notwithstanding any other provisions herein contained in this Agreement, the Underwriters and/or the Managing Underwriter (as the case may be) may by notice in writing to the Company given at any time before the closing Date, terminate, cancel and withdraw their underwriting commitment if:

- (a) there is any breach by the Company of any of the representations, warranties or undertakings contained in Clause 11 (Representations, Warranties and Undertakings) or which is contained in any certificate, statement or notice provided under or in connection with this Agreement, which is not capable of remedy or, if capable of remedy, is not remedied within such number of days as stipulated in the notice of such breach given to the Company; or
- (b) there is failure on the part of the Company to perform any of its obligations contained in this Agreement, including the non-listing and non-quotation of the entire issued and paid-up share capital of the Company on the Main Market of Bursa Securities; or

2. PARTICULARS OF THE IPO (Cont'd)

- (c) there is withholding of information of a material nature from the Underwriters which is required to be disclosed pursuant to this Agreement which, in the opinion of the Managing Underwriter and Underwriters, would have or can reasonably be expected to have, a material adverse effect on the business or operations of the Group, the success of the Public Issue, or the distribution or sale of the Shares issued under the Public Issue and the distribution or sale of the Offer Shares (whether in the primary market or in respect of dealings in the secondary market) or the listing of the Company on Bursa Securities or market conditions generally or which has or is likely to have the effect of making any material part of this Agreement incapable of performance in accordance with its terms; or
- (d) there shall have occurred, or happened any material and adverse change in the business or financial condition of the Company or the Group; or
- (e) there shall have occurred, or happened any of the following circumstances:-
 - (i) any material change, or any development involving a prospective change, in national or international monetary, financial, economic or political conditions (including but not limited to conditions on the stock market, in Malaysia or overseas, foreign exchange market or money market or with regard to inter-bank offer or interest rates both in Malaysia and overseas) or foreign exchange controls or the occurrence of any combination of any of the foregoing; or
 - (ii) any new law, regulation, directive, policy or ruling or any change in existing laws, regulations, directives, policies or rulings or any change in the interpretation or application thereof by any court or other competent authority which would prohibit or impede the obligations of the Managing Underwriter and/or all or any of the Underwriters under this Agreement; or
 - (iii) any government requisition or other occurrence of any nature whatsoever which in the reasonable opinion of the Underwriters affects or will affect the business and/or financial position of the Company; or
 - (iv) any event or series of events beyond the reasonable control of the Underwriters including (without limitation) acts of government, acts of God, acts of terrorism, strikes, lock-outs, fire, explosion, flooding, civil commotion, sabotage, acts of war or accidents which has or is likely to have the effect of making any material part of this Agreement incapable of performance with its terms or which prevents the processing of applications and/or payments pursuant to the Public Issue or pursuant to the underwriting of the underwritten Shares; which, in the reasonable opinion of the Underwriters, would have or can reasonably be expected to have, a material adverse effect on, and/or materially prejudice the business or the operations of the Company or the Group as a whole, the success of the Public Issue, or the listing of the Company on Bursa Securities or market conditions generally or which has or is likely to have the effect of making any material part of this Agreement incapable of performance in accordance with its terms; or

2. PARTICULARS OF THE IPO (Cont'd)

- (v) the approval-in-principle of Bursa Securities for the listing and the quotation of the Shares on the Main Market of Bursa Securities is withdrawn; or
- (vi) the Kuala Lumpur Composite Index has dropped below 850 points and stayed below 850 points for at least three (3) consecutive Market Days.”

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3. RISK FACTORS

In evaluating an investment in the IPO Shares, you should carefully consider all information contained in this Prospectus including but not limited to the following general and specific risks.

3.1 Risks Relating to Our Group's Operations and Financial Performance, and Industry

(i) We may be dependent on strategic location of land banks

The success in developing properties for residential and commercial segments is highly dependent on the choice of location. Our Group's strategy is focused on addressing the premium market segment by developing properties in strategic locations. Strategic locations of land banks are critical in facilitating high and fast take-up of properties.

To-date, our Group's developments are focused on strategic residential and commercial locations. This is reflected in our Group's successful track record of approximately 96% take up from a total of 1,717 completed units from various types of properties.

Nevertheless, despite our Group's strategic land banks, there is no assurance that our Group will continue to achieve a high take-up rate on its on-going and future developments.

(ii) Our business may be affected should we delay in completion of projects

Although our Group seeks to stay competitive by taking the various pro-active steps as mentioned in Section 3.1(v) in our endeavours to secure new developing opportunities, no assurance can be given that any changes to these factors will not have any material adverse effect on our Group's business.

Completion of a development on time is dependent on many external factors which may be beyond the control of our Group, such as obtaining approvals from various regulatory authorities as scheduled, sourcing and securing quality construction materials in adequate amounts, favourable credit terms, environmental factors such as weather conditions and satisfactory performance of contractors who are appointed to complete the development projects. Our Group's Directors and management monitor the project schedules closely to minimise any delay in completion of projects. Nevertheless, there can be no assurance that the abovementioned factors will not lead to delays in the completion of a project. The delays may have a direct impact on our Group's profitability and reputation

(iii) Our business and operations may be affected by the cost of development for property projects and demand risks

Appreciation of land cost and the fluctuation of construction cost are inherent risks in the Property Development Industry. Higher cost of land and construction costs, such as cost of materials (including iron and steel, and cement), labour costs, sub-contractors fees and overheads, will affect the profit margin of property developers where the selling prices of properties are relatively fixed. Even if our Group is able to increase the selling prices of its development properties, there is no assurance that there will be demand for these properties and projects.

3. RISK FACTORS (Cont'd)

Progress and completion of development projects are dependent on various factors, which include the satisfactory performance of subcontractors, availability of building materials and manpower, and weather conditions. Delay in the completion of a development project could result in claims for liquidated and ascertained damages by the customers and thereby adversely affecting our Group's cash flow, profitability and reputation. Our Group seeks to limit this risk by careful planning, close monitoring of project progress, good coordination of various sub-contractors and by strictly complying with quality management measures.

(iv) Property Overhang

The increase in Property Overhang is commonly due to over supply and/or low take-up of new launches by developers. The continuing rise in Property Overhang will have an impact on property developers within the industry. In 2009, the number of unsold units for residential properties reached 22,592 units amounting to RM3.7 billion.

However, in 2009, the number of unsold units for residential properties recorded a decline of 13.2% compared to 2008. This demonstrated an improvement in property take-up environment in Malaysia.

Some of the factors that will help to reduce Property Overhang are as follows:-

- (i) According to the latest Budget 2010, the Malaysian Government will launch a scheme that enables EPF contributors to utilise current and future savings to finance the purchase of higher value or additional houses.
- (ii) According to the latest Budget 2010 and press announcement released by the Prime Minister, Datuk Seri Najib Tun Razak, the Malaysian Government proposed to impose a fixed tax rate of 5% on gains from the disposal of real property that are sold within five years of their purchase. This is effective from 1 January 2010.

The above is aimed at stimulating the demand for properties and reducing the Property Overhang situation in Malaysia. This is expected to have a favourable impact on the Property Development Industry in Malaysia.

(Source: *Assessment of the Property Development Industry, Vital Factor*)

(v) We are exposed to competitive risks

Our Group faces competition in the Property Development Industry. Competitiveness of a property development company is dependent on its ability to acquire reasonably priced land banks at strategic locations, availability of labour supply and the market price of properties.

3. RISK FACTORS (Cont'd)

Our Group has taken pro-active measures to mitigate these risks which include constantly reviewing our development and marketing strategies in response to the ever changing market conditions and to adopt different development concepts and marketing strategies that will correctly position ourselves to meet the needs of the target market. Thus far, our Group's properties are strategically located in Penang, which has the second highest population density after Kuala Lumpur. Furthermore, our Group's developments are in prime locations, which is a major competitive advantage for our Group and this is critical in facilitating a high and fast take-up of properties. Over the years, the values of houses and shop houses in these areas have been appreciating and our management expects this trend to continue in future. With this in mind, many buyers/ potential buyers perceive buying properties in these areas as a profitable and secure investment with good potentials for capital appreciation. Furthermore, our Group has established ourselves as one of the reputable property developers in Penang in developing affordable and quality properties. In addition to the location and pricing of properties, the track record and reputation of a property developer plays an important role in ensuring the successful launching of new property development projects.

Although our Group seeks to stay competitive by taking the various pro-active steps as mentioned above in its endeavours to secure new sales, no assurance can be given that any changes to these factors will not have any material adverse effect on our Group's business.

(vi) We are exposed to business and economic risks

Our Group is subject to risks inherent in the Property Development Industry. These may include, inter-alia, shortage of skilled workforce, raw material shortages, increase in cost of labour and raw materials, changes in general economic, business and credit conditions and changes in government policies. The Property Development Industry could in turn be sensitive to the economic conditions as it is primarily reliant on consumer demand.

Notwithstanding that our Directors and management have the necessary experience and expertise to manage the risks inherent in our business, no assurance can be given that any changes in these factors would not have any material adverse impact on our Group's business and profitability.

(vii) We may be affected by financial risks

Our Group has been profitable for the last five (5) financial years. Our Group rely partially on our internally generated profits and short term and long term financing to fund our growth and operations.

As at 31 December 2009, our Group's total borrowings amounted to approximately RM118.93 million. Our Group intends to utilise part of the proceeds arising from the Rights Issue and Public Issue to repay the bank borrowings. Based on the Proforma Consolidated Balance Sheets as at 31 December 2009 after incorporating the effects of the Listing Scheme and the utilisation of proceeds, our Group's gearing level is approximately 0.70 times.

3. RISK FACTORS (Cont'd)

Our Group's working capital requirements are met partially by borrowings and internally generated funds. Given that our Group has interest bearing borrowings, future fluctuation in the interest rate could have material effects on our Group's interest and principal payments. There can be no assurance that our Group's performance will not be affected in the event of adverse changes in the interest rates. Notwithstanding this, the funds to be generated in the future are expected to meet the repayment of the borrowings and payment of interests. Our Group presently enjoys good credit standing with its bankers and has adequate credit facilities.

The Listing of our Company on Bursa Securities will be advantageous in the long term as it will enable our Group to tap into the capital market in the future to meet its long term funding requirements. The usage of funds from the capital market will enhance profitability through interest savings and expansion of operations.

Fluctuation in interest rates also affect the demand for properties as higher interest rates will increase the cost of acquisition for house buyers and may affect the demand for our Group's properties. With the low interest rates coupled with attractive house financing packages offered by financial institutions, this risk has been minimised to a certain extent. Nevertheless, there is no assurance that interest rates will remain at competitive level and demand for our Group's properties will not be affected in the future.

(viii) We are subject to borrowings covenants

Pursuant to credit facility agreements entered into by our Group with banks or financiers, it is bound by certain positive and negative covenants which may limit its operating and financial flexibility. The aforesaid covenants are of a nature, which is commonly contained in credit facility agreements in Malaysia. Any act by our Group falling within the ambit or scope of such covenants will require the consent of the relevant bank/ financier. Breach of such covenants may give rise to a right by the bank/ financier to terminate the relevant credit facility and/or enforce any security granted in relation to that credit facility. Our Board is aware of such covenants and shall take all necessary precautions to prevent any such breach.

To the best of our Directors' knowledge, as at LPD, neither we nor our subsidiaries are in breach of any terms and conditions or covenants associated with credit arrangements or bank loans, which can materially affect our financial position and results or the investments by holders of securities in our Company and/or our subsidiaries.

(ix) Political and Government regulations and controls

The Government regulation and control in the Property Development Industry are principally to achieve the aspiration of the New Economic Policy of equitable distribution of income and the ownership of homes by the population in general. All the banks are encouraged to extend attractive interest rates for housing loans. In addition, the Property Development Industry is also subject to the jurisdiction of several governmental regulating agencies such as Ministry of Housing and Local Development, CIDB as well as various statutory acts and regulations, including the Occupational Safety and Health Act Environmental Quality Act, 1974 (Act 127), Strata Titles Ordinance, 1995, Housing Development (Control and Licensing) Act 1966 and the requirements of Bomba and local municipal councils.

3. RISK FACTORS (Cont'd)

Furthermore, the local Government administers all aspects including planning and building plans approval, issuance of CF and provides maintenance service of infrastructure such as roads and street lighting, refuse disposal, etc. Before starting any project, the developer shall apply for planning and building plans approvals. Any approval granted shall expire after one (1) year should the developer does not commence development work. Any plans which are expiring should be resubmitted within the period of twelve (12) months or new planning and building plan shall be submitted to supersede the old approvals. After obtaining the planning and building plans approval, the developer is required to obtain housing developer licence and advertising permit from the Ministry of Housing and Local Government. It is a regulatory requirement for the developer to apply for those approvals and licences in order to commence any development project.

These regulations, acts and requirements are to control and protect individual consumers as well as to set the minimum standard for the Property Development and Construction Industries. Our Group has maintained and will continue to maintain strict compliance to all acts requirements and regulations under which our Group operates. However, no assurance can be given that any future changes to the present acts, regulations and requirements or the introduction of any new acts, regulations and requirements will not have a material impact on our Group's business.

(x) We are exposed to the global financial crisis

Any prolonged and/or widespread downturn such as those of the recent global financial turmoil has affected the global and Malaysian economies. This will in turn reduce demand on consumer spending, including investment in properties.

As evidenced in the past, the Malaysian Government's continued prompt policy flexibility in implementing pro-growth measures to sustain the country's growth momentum, by raising domestic demand to compensate for slower external growth, has helped Malaysian companies to counter some of the effects of the slowdown in the global economy.

In early November 2008, the Malaysian Government announced a RM7 billion stimulus package, which was to be channelled into 15 projects to promote business activity, and helps minimise the impact of the global financial crisis.

On 10 March 2009, the Government tabled a mini budget as part of the second stimulus package. The second stimulus package was to be implemented over 2009 and 2010, and will include RM60 billion in spending and incentives.

It is expected that these measures will help to generate domestic business activities and domestic consumption, which will in turn help counter the slowdown in the local economy.

(Source: Assessment of the Property Development Industry, Vital Factor)

3. RISK FACTORS (Cont'd)

(xi) Our Group relies on key personnel and continued management

As in any other business, our Group believes that its continual success will depend to a significant extent upon the abilities, skills, experience, competency and continuous efforts of its existing Directors and management team. Our Group is headed by its Chairman/ Group Chief Executive Officer, Dato' Low Eng Hock who has been in the industry for approximately twenty five (25) years. He is backed up by an experienced Board and supported by a dedicated management team. Our Group will strive to continue attracting and retaining qualified and experienced personnel which are essential towards maintaining the continuous growth of our Group.

Effort is made by our Group to groom and develop younger members of the management team to gradually assume greater responsibilities of the business and operations in preparation for long-term expansion. As such, our Group has implemented a variety of internal and external training programmes to upgrade their knowledge and capabilities. Nevertheless, there is no assurance that the loss of any key Directors and management personnel may not adversely affect our Group's ability to compete in the industry in the short term.

(xii) Potential conflict of interest within our Group

As disclosed in Section 7.1 of this Prospectus, there are certain related party transactions and/or potential and/or actual areas of conflict of interest involving our Promoter, Directors and/or substantial shareholders and/or persons connected with the Promoter, Directors and/or substantial shareholders of our Group.

Independent Directors have been appointed to the Audit Committee as well as to the Board. The responsibilities of the Independent Directors would be to provide balance to the management of our Group and to undertake the functions, amongst others, of overseeing the conduct of our Group's business to evaluate whether our business is being properly managed, identify principal risks and ensure the implementation of appropriate systems to manage these risks, and reviewing the adequacy and the integrity of our Group's internal control systems and management information systems, including systems for compliance with applicable laws, regulations, rules, directives and guidelines.

Should there be any issue or concern with regard to the related party transactions or conflict of interest affecting our Group, the Audit Committee will investigate and take the necessary measures.

(xiii) Our insurance coverage may not be adequate for our operations

Our Group is aware of the adverse consequences arising from inadequate insurance coverage that could cripple our business operations. In ensuring such risks are maintained to the minimum, our Group reviews and ensures adequate coverage for our asset, and development projects on a continuous basis. For our Group's operations, all assets such as plant and equipment, inventory, office equipment and furniture and fitting are sufficiently insured under fire and other insurance policies.

Although our Group has taken the necessary measures to ensure that all our assets are adequately covered by insurance, there can be no assurance that the insurance coverage would be adequate to compensate for the replacement cost of the assets or any consequential loss arising therefrom.

3. RISK FACTORS (Cont'd)

(xiv) Achievability of proforma consolidated profit forecast by our Group

It should be noted that the proforma consolidated profit forecast is based on various assumptions in respect to the levels and timing of revenues, cost, interest rates and various other matters of an operational or financial nature, which assumptions are believed by our Directors to be reasonable. These assumptions are nevertheless subject to uncertainties and contingencies. Because of the subjective judgments and inherent uncertainties of forecast and because of the events and circumstances may not occur as expected, no assurance can be given that such assumptions and the resultant forecast result will be realised, and actual results may be materially different from that shown. Investors should note carefully the bases and assumptions to the proforma consolidated profit forecast as well as the comments by the Reporting Accountants in their letters on the proforma consolidated profit forecast as set out in Sections 10.6 and 10.7 of this Prospectus.

(xv) Our operations may be affected by material litigation, claim or arbitration

As at LPD, save as disclosed in Section 15.6 of this Prospectus, neither our Company nor our subsidiaries and associated companies, are engaged in any litigation or arbitration proceedings which have or may have material effects on our business or financial position, and our Company's Directors are unaware of any proceedings threatened or of any fact likely to give rise to any proceedings, which may materially affect our financial position or business.

However, there can be no assurance that there will be no proceedings in the future that could adversely affect the operations and profitability of our Group.

(xvi) Control by our Promoter

Upon our Listing, our Promoter, Dato' Low Eng Hock, as set out in Section 5.1 of this Prospectus, will hold at least approximately 52.48% of our enlarged issued and paid-up share capital. As a result, he will still be able to, in the foreseeable future, effectively control the business direction and management of our Group as well as influence the outcome of certain matters requiring the vote of our shareholders unless our Promoter is required to abstain from voting by law and/or by the relevant guidelines or regulations.

Nevertheless, as a step towards good corporate governance, we have appointed three (3) Independent Directors and set up an Audit Committee to ensure that, inter alia, all future transactions involving related parties, if any, are entered into on an arm's-length basis, or normal commercial terms that are not more favourable to the related parties than those generally available to third parties and are not to the detriment of our minority shareholders.

3. RISK FACTORS (Cont'd)

3.2 Risks Relating to the IPO**(i) Payment of Dividend**

We are principally an investment holding company and we operate our core business through our subsidiaries. Therefore, the availability of funds to us to pay dividends or make other distributions to our shareholders depend upon dividends or other distributions received from our subsidiaries.

If our subsidiaries incur debts or losses, such indebtedness or losses may impair our subsidiaries' ability to pay dividends or other distributions to us. As a result, our ability to pay dividends will be restricted. In addition, restrictive covenants in bank credit facilities or other agreements that we or our subsidiaries may enter into in the future may also restrict the ability of our subsidiaries to make contributions to us and our ability to receive distributions. Therefore, these restrictions on the availability and usage of our major source of funding may impact our ability to pay dividends to our shareholders.

Our ability to pay dividends or make other distributions to our shareholders is also subject to the future financial performance and cash flow position of our Group. There is no assurance that we will be able to distribute dividends to our shareholders as a result of the abovementioned factors. Accordingly, our historical dividend distribution should not be used as a reference or basis to determine the level of dividends that may be declared and paid by us in the future. There is also no assurance that we will be able to record profits and have sufficient funds above our funding requirements, other obligations and business plans to declare dividends to our shareholders. Please refer to Section 10.9 of this Prospectus for details on our dividend policy.

(ii) Our Shares are subject to capital market risks, which could result in the value of your investment in our Shares to decline

The performance of the local bourse is very much dependent on external factors such as the performance of the regional and world bourses, and the flows of foreign funds. Sentiments are also driven by internal factors such as the political and economic conditions of the country. These factors invariably contribute to the volatility of the local bourse. Our Shares upon Listing on Bursa Securities will be subject to the vagaries of the capital market. Nevertheless, the profitability of our Group is not dependent on the performance of Bursa Securities as the business activities of our Group have no direct correlation with the performance of Bursa Securities.

The market price of our Shares may fluctuate significantly and rapidly in response to, *inter alia*, the following factors, some of which are beyond our control:-

- (a) variations in our operating results;
- (b) changes in securities analysts' recommendations, perceptions or estimates of our financial performance;
- (c) changes in market valuations and share prices of companies with similar businesses to our Company that may be listed in Malaysia;

3. RISK FACTORS (Cont'd)

- (d) announcements by us of significant acquisitions, strategic alliances or joint ventures;
- (v) fluctuation in stock market prices and trading volume;
- (f) our involvement in material litigation;
- (g) additions or departures of key personnel;
- (h) success or failure of our management in implementing business and growth strategies; and
- (i) changes in conditions affecting the industry, the general economic conditions or stock market sentiments or other events or factors.

(iii) There may be a delay in our Listing or the Listing may be aborted

The success of our listing exercise is also exposed to the risk that it may fail or be delayed should any of the following events occur:-

- (a) The Bumiputera investors approved by MITI fail to subscribe for the IPO Shares allocated to them;
- (b) The underwriter exercising its rights pursuant to the Underwriting Agreement discharging itself from its obligations thereunder;
- (c) The places under the Private Placement fail to subscribe for the IPO Shares allocated to them; and
- (d) Our Company is unable to meet the public spread requirements, i.e. at least 25% of the total enlarged issued and paid-up share capital of our Company must be held by a minimum of one thousand (1,000) public shareholders holding not less than one hundred (100) Shares each in our Company at the point of listing.

Our Group will endeavour to comply with the Listing Requirements and SC Guidelines whichever is applicable and relevant to the above. However, there can be no assurance that the abovementioned factors/ events will not cause a delay in or abortion of our Listing.

(iv) There is no prior market for our Shares and an active market for our Shares may not develop

Prior to our IPO, there has been no public market for our Shares. There can be no assurance that an active market for our Shares will develop and continue to develop upon or subsequent to its listing on the Main Market of the Bursa Securities or, if developed, that such a market will be sustained. The IPO Price has been determined after taking into consideration a number of factors, including but not limited to, our Group's financial and operating history and condition, the prospects of our Company and the industry in which our Group operates, the management, the market prices for shares of companies engaged in business similar to that of our Group and the prevailing market conditions. There can be no assurance that the IPO Price will correspond to the price at which our Shares will trade on the Main Market of Bursa Securities upon or subsequent to our listing.

3. RISK FACTORS (Cont'd)

(v) Disclosure Regarding Forward-Looking Statements

Certain statements in this Prospectus are based on historical data, which may not be reflective of the future results and any forward-looking statements in nature are subject to uncertainties and contingencies. All forward-looking statements are based on estimate, forecast and assumptions made by our Company, and although believed to be reasonable, are subject to unknown risks, uncertainties and other factors which may cause the actual results, performance or achievements to differ materially from the future results, performance of achievements expressed or implied in such forward-looking statements. Such factors include, inter-alia, general economic and business conditions, competition and the impact of new laws and regulations affecting our Group. In the light of these and other uncertainties, the inclusion of any forward-looking statements in this Prospectus should not be regarded as a representation by our Company or our Company's adviser that the plans and objectives of our Group will be achieved.

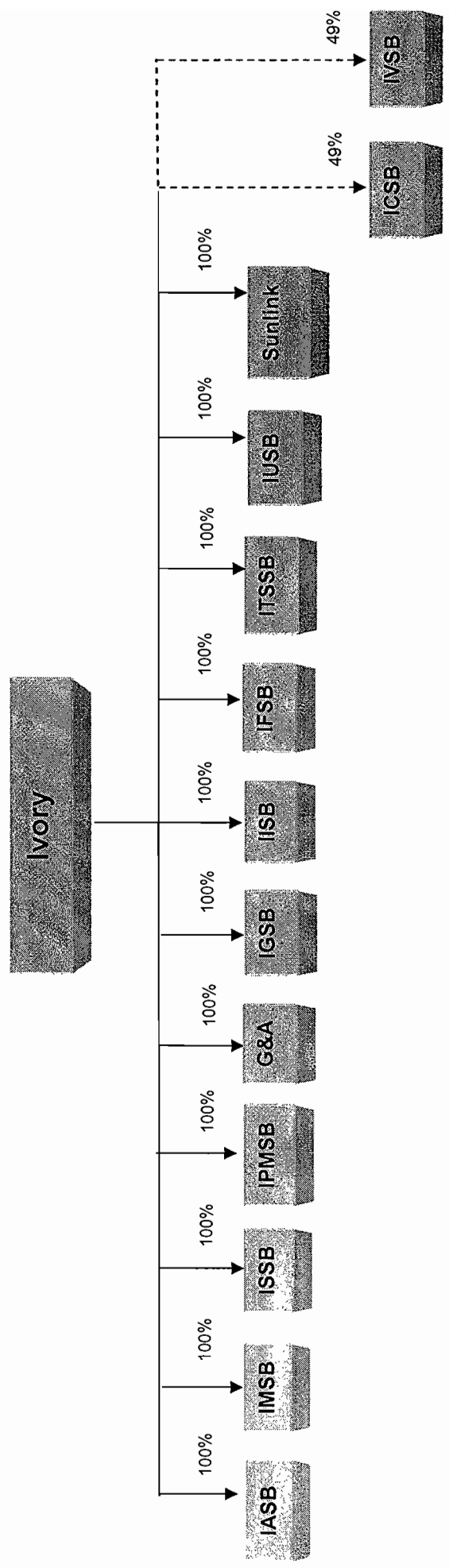
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4. INFORMATION ON OUR GROUP

4.1 GROUP OVERVIEW

4.1.1 Corporate Structure

The structure of our Group and our associated companies is as set out below:-



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4. INFORMATION ON OUR GROUP (Cont'd)

The details of our subsidiaries and associated companies are as follows:-

Company	Date/ Place of Incorporation	Issued and Paid-up Share Capital (RM)	Effective Equity Interest (%)	Principal Activities
<u>Subsidiaries of Our Company</u>				
IASB	10.06.1999/ Malaysia	6,500,000	100.00	Property development and building and construction
IMSB	21.08.1999/ Malaysia	1,000,000	100.00	Property development
ISSB	10.04.2000/ Malaysia	1,920,000	100.00	Property development
IPMSB	21.06.2000/ Malaysia	100,000	100.00	Property management
G&A	28.09.2000/ Malaysia	100,000	100.00	Engineering and architectural consultancy
IGSB	26.05.2001/ Malaysia	3,000,000	100.00	Property development
IISB	20.09.2002/ Malaysia	250,000	100.00	Property development
IFSB	25.09.2003/ Malaysia	100,000	100.00	Interior design and fit-out
ITSSB	09.10.2007/ Malaysia	2	100.00	Commercial property management
IUSB	06.10.2008/ Malaysia	2	100.00	Provision of utilities services. IUSB has not commenced operations
Sunlink	22.10.2008/ Malaysia	100,000	100.00	Operation of food services outlets
<u>Associated Companies of Our Company</u>				
ICSB	05.08.1999/ Malaysia	2,000,000	49.00	Property development
IVSB	14.07.2001/ Malaysia	1,000,000	49.00	Property development

4. INFORMATION ON OUR GROUP (Cont'd)**4.1.2 Share Capital and Changes in Share Capital**

The present authorised share capital of our Company is RM100,000,000 comprising 200,000,000 Shares. The issued and paid-up share capital of our Company is RM70,550,500 comprising 141,101,000 Shares.

Details of the changes in our issued and paid-up share capital since our incorporation up to LPD are as follows:-

Date of Allotment/ Subdivision	No. Of Shares Allotted/ Subdivided	Par Value RM	Consideration	Cumulative Issued And Paid-up Share Capital RM
27.11.2004	2	1.00	Subscribers' shares	2
11.03.2010	4	0.50	Subdivision	2
11.03.2010	141,100,855	0.50	Acquisitions	70,550,430
15.03.2010	141	0.50	Rights Issue	70,550,500

Our issued and paid-up share capital will be increased to 186,000,000 Shares subsequent to the Public Issue of 44,899,000 Shares.

None of our Shares as tabulated above were issued at a discount, on special terms or instalment payment terms. As at the date of this Prospectus, we do not have any warrant, option or convertible securities in issue or any uncalled capital.

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4. INFORMATION ON OUR GROUP (Cont'd)

4.1.3 Our Subsidiaries and Associated Companies

(i) IASB

(a) Background/ History

IASB was incorporated in Malaysia under the Act as a private limited company on 10 June 1999 under its present name. IASB commenced business in June 1999.

(b) Principal Activities and Products/ Services

IASB is principally involved in property development and building and construction.

(c) Substantial Shareholders

The substantial shareholders of IASB are as follows:-

Name	No. of Ordinary Shares of RM1.00 Each Held			
	Direct	%	Indirect	%
Ivory	6,500,000	100.00	-	-
Dato' Low Eng Hock	-	-	*6,500,000	100.00

Note:-

* Deemed interested by virtue of his shareholding of not less than 15% in Ivory pursuant to Section 6A of the Act.

(d) Share Capital

The authorised share capital of IASB is RM10,000,000 comprising 10,000,000 ordinary shares of RM1.00 each. The issued and paid-up share capital of IASB is RM6,500,000 comprising 6,500,000 ordinary shares of RM1.00 each.

The changes in IASB's issued and paid-up share capital since incorporation are as follows:-

Date Issued	No. of Shares Allotted	Par Value RM	Type of Issue	Cumulative Issued and Paid-Up Share Capital RM
10.06.1999	2	1.00	Subscribers' shares	2
01.12.1999	499,998	1.00	Cash	500,000
25.09.2000	500,000	1.00	Cash	1,000,000
29.12.2006	5,500,000	1.00	Cash	6,500,000

None of IASB's shares as tabulated above were issued at a discount, on special terms or instalment payment terms. As at the date of this Prospectus, IASB does not have any warrant, option or convertible securities in issue or any uncalled capital.

(e) Subsidiary/ Associated Company

As at the date of this Prospectus, IASB does not have any subsidiary or associated company.

4. INFORMATION ON OUR GROUP (Cont'd)

(ii) IMSB

(a) Background/ History

IMSB was incorporated in Malaysia under the Act as a private limited company on 21 August 1999 under its present name. IMSB commenced business in August 2001.

(b) Principal Activities and Products/ Services

IMSB is principally involved in property development.

(c) Substantial Shareholders

The substantial shareholders of IMSB are as follows:-

Name	No. of Ordinary Shares of RM1.00 Each Held			
	Direct	%	Indirect	%
Ivory Dato' Low Eng Hock	1,000,000	100.00	-	-
	-	-	*1,000,000	100.00

Note:-

* Deemed interested by virtue of his shareholding of not less than 15% in Ivory pursuant to Section 6A of the Act.

(d) Share Capital

The authorised share capital of IMSB is RM1,000,000 comprising 1,000,000 ordinary shares of RM1.00 each. The issued and paid-up share capital of IMSB is RM1,000,000 comprising 1,000,000 ordinary shares of RM1.00 each.

The changes in IMSB's issued and paid-up share capital since incorporation are as follows:-

Date Issued	No. of Shares Allotted	Par Value RM	Type of Issue	Cumulative Issued and Paid-Up Share Capital RM
21.08.1999	2	1.00	Subscribers' shares	2
14.06.2002	999,998	1.00	Cash	1,000,000

None of IMSB's shares as tabulated above were issued at a discount, on special terms or instalment payment terms. As at the date of this Prospectus, IMSB does not have any warrant, option or convertible securities in issue or any uncalled capital.

(e) Subsidiary/ Associated Company

As at the date of this Prospectus, IMSB does not have any subsidiary or associated company.

4. INFORMATION ON OUR GROUP (Cont'd)**(iii) ISSB****(a) Background/ History**

ISSB was incorporated in Malaysia under the Act as a private limited company on 10 April 2000 under its present name. ISSB commenced business in June 2000.

(b) Principal Activities and Products/ Services

ISSB is principally involved in property development.

(c) Substantial Shareholders

The substantial shareholders of ISSB are as follows:-

Name	No. of Ordinary Shares of RM1.00 Each Held			
	Direct	%	Indirect	%
Ivory Dato' Low Eng Hock	1,920,000	100.00	-	-
	-	-	*1,920,000	100.00

Note:-

* Deemed interested by virtue of his shareholding of not less than 15% in Ivory pursuant to Section 6A of the Act.

(d) Share Capital

The authorised share capital of ISSB is RM5,000,000 comprising 5,000,000 ordinary shares of RM1.00 each. The issued and paid-up share capital of ISSB is RM1,920,000 comprising 1,920,000 ordinary shares of RM1.00 each.

The changes in ISSB's issued and paid-up share capital since incorporation are as follows:-

Date Issued	No. of Shares Allotted	Par Value RM	Type of Issue	Cumulative Issued and Paid-Up Share Capital RM
10.04.2000	2	1.00	Subscribers' shares	2
18.07.2000	999,998	1.00	Cash	1,000,000
30.04.2008	920,000	1.00	Cash	1,920,000

None of ISSB's shares as tabulated above were issued at a discount, on special terms or instalment payment terms. As at the date of this Prospectus, ISSB does not have any warrant, option or convertible securities in issue or any uncalled capital.

(e) Subsidiary/ Associated Company

As at the date of this Prospectus, ISSB does not have any subsidiary or associated company.

4. INFORMATION ON OUR GROUP (Cont'd)**(iv) IPMSB****(a) Background/ History**

IPMSB was incorporated in Malaysia under the Act as a private limited company on 21 June 2000 under the name of Ivory Wealth Sdn Bhd. On 22 May 2003, it changed and assumed its present name. IPMSB commenced business in September 2003.

(b) Principal Activities and Products/ Services

IPMSB is principally involved in property management.

(c) Substantial Shareholders

The substantial shareholders of IPMSB are as follows:-

Name	No. of Ordinary Shares of RM1.00 Each Held			
	Direct	%	Indirect	%
Ivory Dato' Low Eng Hock	100,000	100.00	-	-
	-	-	*100,000	100.00

Note:-

* Deemed interested by virtue of his shareholding of not less than 15% in Ivory pursuant to Section 6A of the Act.

(d) Share Capital

The authorised share capital of IPMSB is RM500,000 comprising 500,000 ordinary shares of RM1.00 each. The issued and paid-up share capital of IPMSB is RM100,000 comprising 100,000 ordinary shares of RM1.00 each.

The changes in IPMSB's issued and paid-up share capital since incorporation are as follows:-

Date Issued	No. of Shares Allotted	Par Value RM	Type of Issue	Cumulative Issued and Paid-Up Share Capital RM
21.06.2000	2	1.00	Subscribers' shares	2
28.11.2001	98	1.00	Cash	100
27.08.2007	99,900	1.00	Cash	100,000

None of IPMSB's shares as tabulated above were issued at a discount, on special terms or instalment payment terms. As at the date of this Prospectus, IPMSB does not have any warrant, option or convertible securities in issue or any uncalled capital.

(e) Subsidiary/ Associated Company

As at the date of this Prospectus, IPMSB does not have any subsidiary or associated company.

4. INFORMATION ON OUR GROUP (Cont'd)**(v) G&A****(a) Background/ History**

G&A was incorporated in Malaysia under the Act as a private limited company on 28 September 2000 under its present name. G&A commenced business in January 2002.

(b) Principal Activities and Products/ Services

G&A is principally involved in engineering and architectural consultancy.

(c) Substantial Shareholders

The substantial shareholders of G&A are as follows:-

Name	No. of Ordinary Shares of RM1.00 Each Held			
	Direct	%	Indirect	%
Ivory Dato' Low Eng Hock	100,000	100.00	-	-
	-	-	*100,000	100.00

Note:-

* Deemed interested by virtue of his shareholding of not less than 15% in Ivory pursuant to Section 6A of the Act.

(d) Share Capital

The authorised share capital of G&A is RM100,000 comprising 100,000 ordinary shares of RM1.00 each. The issued and paid-up share capital of G&A is RM100,000 comprising 100,000 ordinary shares of RM1.00 each.

The changes in G&A's issued and paid-up share capital since incorporation are as follows:-

Date Issued	No. of Shares Allotted	Par Value RM	Type of Issue	Cumulative Issued and Paid-Up Share Capital RM
28.09.2000	4	1.00	Subscribers' shares	4
03.09.2004	99,996	1.00	Cash	100,000

None of G&A's shares as tabulated above were issued at a discount, on special terms or instalment payment terms. As at the date of this Prospectus, G&A does not have any warrant, option or convertible securities in issue or any uncalled capital.

(e) Subsidiary/ Associated Company

As at the date of this Prospectus, G&A does not have any subsidiary or associated company.

4. INFORMATION ON OUR GROUP (Cont'd)**(vi) IGSB****(a) Background/ History**

IGSB was incorporated in Malaysia under the Act as a private limited company on 26 May 2001 under the name of Floodmaster Barriers (M) Sdn Bhd. On 18 February 2003, it changed and assumed its present name. IGSB commenced business in January 2004.

(b) Principal Activities and Products/ Services

IGSB is principally involved in property development.

(c) Substantial Shareholders

The substantial shareholders of IGSB are as follows:-

Name	No. of Ordinary Shares of RM1.00 Each Held			
	Direct	%	Indirect	%
Ivory Dato' Low Eng Hock	3,000,000	100.00	-	-
	-	-	*3,000,000	100.00

Note:-

* Deemed interested by virtue of his shareholding of not less than 15% in Ivory pursuant to Section 6A of the Act.

(d) Share Capital

The authorised share capital of IGSB is RM5,000,000 comprising 5,000,000 ordinary shares of RM1.00 each. The issued and paid-up share capital of IGSB is RM3,000,000 comprising 3,000,000 ordinary shares of RM1.00 each.

The changes in IGSB's issued and paid-up share capital since incorporation are as follows:-

Date Issued	No. of Shares Allotted	Par Value RM	Type of Issue	Cumulative Issued and Paid-Up Share Capital RM
26.05.2001	2	1.00	Subscribers' shares	2
25.06.2003	98	1.00	Cash	100
02.01.2004	999,900	1.00	Cash	1,000,000
22.07.2005	1,000,000	1.00	Cash	2,000,000
05.08.2005	1,000,000	1.00	Cash	3,000,000

None of IGSB's shares as tabulated above were issued at a discount, on special terms or instalment payment terms. As at the date of this Prospectus, IGSB does not have any warrant, option or convertible securities in issue or any uncalled capital.

(e) Subsidiary/ Associated Company

As at the date of this Prospectus, IGSB does not have any subsidiary or associated company.

4. INFORMATION ON OUR GROUP (Cont'd)**(vii) IISB****(a) Background/ History**

IISB was incorporated in Malaysia under the Act as a private limited company on 20 September 2002 under the name of Quorum Fine Jewellery (M) Sdn Bhd. On 12 December 2005, it changed and assumed its present name. IISB commenced business in March 2007.

(b) Principal Activities and Products/ Services

IISB is principally involved in property development.

(c) Substantial Shareholders

The substantial shareholders of IISB are as follows:-

Name	No. of Ordinary Shares of RM1.00 Each Held			
	Direct	%	Indirect	%
Ivory Dato' Low Eng Hock	250,000	100.00	-	-
	-	-	*250,000	100.00

Note:-

* Deemed interested by virtue of his shareholding of not less than 15% in Ivory pursuant to Section 6A of the Act.

(d) Share Capital

The authorised share capital of IISB is RM5,000,000 comprising 5,000,000 ordinary shares of RM1.00 each. The issued and paid-up share capital of IISB is RM250,000 comprising 250,000 ordinary shares of RM1.00 each.

The changes in IISB's issued and paid-up share capital since incorporation are as follows:-

Date Issued	No. of Shares Allotted	Par Value RM	Type of Issue	Cumulative Issued and Paid-Up Share Capital RM
20.09.2002	2	1.00	Subscribers' shares	2
08.09.2006	99,998	1.00	Cash	100,000
25.01.2008	150,000	1.00	Cash	250,000

None of IISB's shares as tabulated above were issued at a discount, on special terms or instalment payment terms. As at the date of this Prospectus, IISB does not have any warrant, option or convertible securities in issue or any uncalled capital.

(e) Subsidiary/ Associated Company

As at the date of this Prospectus, IISB does not have any subsidiary or associated company.

4. INFORMATION ON OUR GROUP (Cont'd)

(viii) IFSB

(a) Background/ History

IFSB was incorporated in Malaysia under the Act as a private limited company on 25 September 2003 under its present name. IFSB commenced business in December 2003.

(b) Principal Activities and Products/ Services

IFSB is principally involved in interior design and fit-out.

(c) Substantial Shareholders

The substantial shareholders of IFSB are as follows:-

Name	No. of Ordinary Shares of RM1.00 Each Held			
	Direct	%	Indirect	%
Ivory Dato' Low Eng Hock	100,000	100.00	-	-
	-	-	*100,000	100.00

Note:-

* Deemed interested by virtue of his shareholding of not less than 15% in Ivory pursuant to Section 6A of the Act.

(d) Share Capital

The authorised share capital of IFSB is RM100,000 comprising 100,000 ordinary shares of RM1.00 each. The issued and paid-up share capital of IFSB is RM100,000 comprising 100,000 ordinary shares of RM1.00 each.

The changes in IFSB's issued and paid-up share capital since incorporation are as follows:-

Date Issued	No. of Shares Allotted	Par Value RM	Type of Issue	Cumulative Issued and Paid-Up Share Capital RM
25.09.2003	2	1.00	Subscribers' shares	2
17.02.2004	99,998	1.00	Cash	100,000

None of IFSB's shares as tabulated above were issued at a discount, on special terms or instalment payment terms. As at the date of this Prospectus, IFSB does not have any warrant, option or convertible securities in issue or any uncalled capital.

(e) Subsidiary/ Associated Company

As at the date of this Prospectus, IFSB does not have any subsidiary or associated company.

4. INFORMATION ON OUR GROUP (Cont'd)

(ix) ITSSB

(a) Background/ History

ITSSB was incorporated in Malaysia under the Act as a private limited company on 9 October 2007 under its present name. ITSSB commenced business in August 2008.

(b) Principal Activities and Products/ Services

ITSSB is principally involved in commercial property management.

(c) Substantial Shareholders

The substantial shareholders of ITSSB are as follows:-

Name	No. of Ordinary Shares of RM1.00 Each Held			
	Direct	%	Indirect	%
Ivory	2	100.00	-	-
Dato' Low Eng Hock	-	-	*2	100.00

Note:-

* Deemed interested by virtue of his shareholding of not less than 15% in Ivory pursuant to Section 6A of the Act.

(d) Share Capital

The authorised share capital of ITSSB is RM100,000 comprising 100,000 ordinary shares of RM1.00 each. The issued and paid-up share capital of ITSSB is RM2 comprising 2 ordinary shares of RM1.00 each.

The changes in ITSSB's issued and paid-up share capital since incorporation are as follows:-

Date Issued	No. of Shares Allotted	Par Value RM	Type of Issue	Cumulative Issued and Paid-Up Share Capital RM
09.10.2007	2	1.00	Subscribers' shares	2

None of ITSSB's shares as tabulated above were issued at a discount, on special terms or instalment payment terms. As at the date of this Prospectus, ITSSB does not have any warrant, option or convertible securities in issue or any uncalled capital.

(e) Subsidiary/ Associated Company

As at the date of this Prospectus, ITSSB does not have any subsidiary or associated company.

4. INFORMATION ON OUR GROUP (Cont'd)**(x) IUSB****(a) Background/ History**

IUSB was incorporated in Malaysia under the Act as a private limited company on 6 October 2008 under its present name. IUSB has not yet commenced operations since the date of incorporation.

(b) Principal Activities and Products/ Services

IUSB is to be principally involved in provision of utilities services. IUSB has not commenced operations.

(c) Substantial Shareholders

The substantial shareholders of IUSB are as follows:-

Name	No. of Ordinary Shares of RM1.00 Each Held			
	Direct	%	Indirect	%
Ivory Dato' Low Eng Hock	2	100.00	-	-
	-	-	2	100.00

Note:-

* Deemed interested by virtue of his shareholding of not less than 15% in Ivory pursuant to Section 6A of the Act.

(d) Share Capital

The authorised share capital of IUSB is RM100,000 comprising 100,000 ordinary shares of RM1.00 each. The issued and paid-up share capital of IUSB is RM2 comprising 2 ordinary shares of RM1.00 each.

The changes in IUSB's issued and paid-up share capital since incorporation are as follows:-

Date Issued	No. of Shares Allotted	Par Value RM	Type of Issue	Cumulative Issued and Paid-Up Share Capital RM
06.10.2008	2	1.00	Subscribers' shares	2

None of IUSB's shares as tabulated above were issued at a discount, on special terms or instalment payment terms. As at the date of this Prospectus, IUSB does not have any warrant, option or convertible securities in issue or any uncalled capital.

(e) Subsidiary/ Associated Company

As at the date of this Prospectus, IUSB does not have any subsidiary or associated company.

4. INFORMATION ON OUR GROUP (Cont'd)**(xi) Sunlink****(a) Background/ History**

Sunlink was incorporated in Malaysia under the Act as a private limited company on 22 October 2008 under its present name. Sunlink commenced business in January 2009.

(b) Principal Activities and Products/ Services

Sunlink is principally involved in operation of food services outlets.

(c) Substantial Shareholders

The substantial shareholders of Sunlink are as follows:-

Name	No. of Ordinary Shares of RM1.00 Each Held			
	Direct	%	Indirect	%
Ivory Dato' Low Eng Hock	100,000	100.00	-	-
	-	-	*100,000	100.00

Note:-

* Deemed interested by virtue of his shareholding of not less than 15% in Ivory pursuant to Section 6A of the Act.

(d) Share Capital

The authorised share capital of Sunlink is RM100,000 comprising 100,000 ordinary shares of RM1.00 each. The issued and paid-up share capital of Sunlink is RM100,000 comprising 100,000 ordinary shares of RM1.00 each.

The changes in Sunlink's issued and paid-up share capital since incorporation are as follows:-

Date Issued	No. of Shares Allotted	Par Value RM	Type of Issue	Cumulative Issued and Paid-Up Share Capital RM
22.10.2008	2	1.00	Subscribers' shares	2
25.11.2008	99,998	1.00	Cash	100,000

None of Sunlink's shares as tabulated above were issued at a discount, on special terms or instalment payment terms. As at the date of this Prospectus, Sunlink does not have any warrant, option or convertible securities in issue or any uncalled capital.

(e) Subsidiary/ Associated Company

As at the date of this Prospectus, Sunlink does not have any subsidiary or associated company.

4. INFORMATION ON OUR GROUP (Cont'd)**(xii) ICSB****(a) Background/ History**

ICSB was incorporated in Malaysia under the Act as a private limited company on 5 August 1999 under its present name. ICSB commenced business in October 2003.

(b) Principal Activities and Products/ Services

ICSB is principally involved in property development.

(c) Substantial Shareholders

The substantial shareholders of ICSB are as follows:-

Name	No. of Ordinary Shares of RM1.00 Each Held			
	Direct	%	Indirect	%
Ivory	980,000	49.00	-	-
Dato' Low Eng Hock	-	-	*980,000	49.00
Azri Bin Mohamed Aziz	1,020,000	51.00	-	-

Note:-

* Deemed interested by virtue of his shareholding of not less than 15% in Ivory pursuant to Section 6A of the Act.

(d) Share Capital

The authorised share capital of ICSB is RM5,000,000 comprising 5,000,000 ordinary shares of RM1.00 each. The issued and paid-up share capital of ICSB is RM2,000,000 comprising 2,000,000 ordinary shares of RM1.00 each.

The changes in ICSB's issued and paid-up share capital since incorporation are as follows:-

Date Issued	No. of Shares Allotted	Par Value RM	Type of Issue	Cumulative Issued and Paid-Up Share Capital RM
05.08.1999	2	1.00	Subscribers' shares	2
03.09.2002	99,998	1.00	Cash	100,000
09.07.2007	150,000	1.00	Cash	250,000
27.06.2008	1,750,000	1.00	Cash	2,000,000

None of ICSB's shares as tabulated above were issued at a discount, on special terms or instalment payment terms. As at the date of this Prospectus, ICSB does not have any warrant, option or convertible securities in issue or any uncalled capital.

(e) Subsidiary/ Associated Company

As at the date of this Prospectus, ICSB does not have any subsidiary or associated company.

4. INFORMATION ON OUR GROUP (Cont'd)**(xiii) IVSB****(a) Background/ History**

IVSB was incorporated in Malaysia under the Act as a private limited company on 14 July 2001 under its present name. IVSB commenced business in October 2002.

(b) Principal Activities and Products/ Services

IVSB is principally involved in property development.

(c) Substantial Shareholders

The substantial shareholders of IVSB are as follows:-

Name	No. of Ordinary Shares of RM1.00 Each Held			
	Direct	%	Indirect	%
Ivory	490,000	49.00	-	-
Dato' Low Eng Hock	-	-	*490,000	49.00
Azri Bin Mohamed Aziz	270,000	27.00	-	-
Zaida Binti Ayob	140,000	14.00	-	-
Dato' Mohamad Subky Bin Haji Abdul Raof	100,000	10.00	-	-

Note:-

* Deemed interested by virtue of his shareholding of not less than 15% in Ivory pursuant to Section 6A of the Act.

(d) Share Capital

The authorised share capital of IVSB is RM1,000,000 comprising 1,000,000 ordinary shares of RM1.00 each. The issued and paid-up share capital of IVSB is RM1,000,000 comprising 1,000,000 ordinary shares of RM1.00 each.

The changes in IVSB's issued and paid-up share capital since incorporation are as follows:-

Date Issued	No. of Shares Allotted	Par Value RM	Type of Issue	Cumulative Issued and Paid-Up Share Capital RM
14.07.2001	2	1.00	Subscribers' shares	2
08.10.2001	8	1.00	Cash	10
21.03.2002	90	1.00	Cash	100
11.07.2002	999,900	1.00	Cash	1,000,000

None of IVSB's shares as tabulated above were issued at a discount, on special terms or instalment payment terms. As at the date of this Prospectus, IVSB does not have any warrant, option or convertible securities in issue or any uncalled capital.

(e) Subsidiary/ Associated Company

As at the date of this Prospectus, IVSB does not have any subsidiary or associated company.

4. INFORMATION ON OUR GROUP (Cont'd)

4.2 LISTING SCHEME

In conjunction with and as an integral part of our Listing, we undertook the Listing Scheme, which involved the following:-

(i) Subdivision

We undertook a subdivision of 2 ordinary shares of RM1.00 each into 4 new Shares on the basis of two (2) new Shares for every one (1) existing ordinary share of RM1.00 each held.

The Subdivision resulted in the issued and paid-up share capital of our Company being increased from 2 ordinary shares of RM1.00 each to 4 Shares.

The Subdivision was completed on 11 March 2010.

(ii) Acquisitions

(a) Acquisition of IASB

We had entered into a conditional share sale agreement dated 21 May 2007 and supplemental agreements dated 10 November 2008, 14 September 2009 and 12 November 2009 respectively with Dato' Low Eng Hock, Ooi Choi Kiat and Dato' Seri Nazir Ariff Bin Mushir Ariff to acquire the entire issued and paid-up share capital of IASB comprising 6,500,000 ordinary shares of RM1.00 each for a purchase consideration of RM102,118,975 satisfied wholly by the issuance of 84,395,847 new Shares in our Company at an issue price of RM1.21 per Share. The purchase consideration of IASB was based on the adjusted consolidated NTA of IASB as at 31 December 2008 after taking into account the adjustment to the fair value (net of deferred taxation) of certain properties of the IASB group of RM39,570,409 as set out below:-

	RM
Audited consolidated NTA of IASB as at 31 December 2008	62,548,566
Add: Fair value adjustment to certain properties of the IASB group (net of deferred taxation)	#39,570,409
Adjusted consolidated NTA of IASB as at 31 December 2008	<u>102,118,975</u>

Note:-

The fair value adjustment arising from the revaluation of the properties of the following companies is as set out below:-

	(A) Market Value as at 30 April 2008 * RM	(B) Net Book Value as at 30 April 2008 RM	(C = A - B) Gross Surplus RM	(D) Deferred Taxation RM	(E = C - D) Net Surplus RM	(F) Equity Interest %	(G = E x F) Amount of Surplus RM
IASB	8,277,178	8,259,832	17,346	4,510	12,836	100.00	12,836
IGSB	204,200,000	115,106,367	89,093,633	23,164,345	65,929,288	60.00	39,557,573
Total	<u>212,477,178</u>	<u>123,366,199</u>	<u>89,110,979</u>	<u>23,168,855</u>	<u>65,942,124</u>		<u>39,570,409</u>

* The revaluation of the properties is based on market value as appraised by the Independent Registered Valuers, Messrs Henry Butcher Malaysia (Penang) Sdn Bhd and Henry Butcher Malaysia (Seberang Perai) Sdn Bhd on 30 April 2008 based on the Comparison Method, Investment Method and Residual Method of Valuation. Please refer to Sections 8 and 12 of this Prospectus for further details on valuation of the properties.

4. INFORMATION ON OUR GROUP (Cont'd)

The shareholdings of IASB's vendors in our Company pursuant to the Acquisition of IASB are as follows:-

Shareholders	No. of Ordinary Shares of RM1.00 Each Held in IASB	Equity Interest %	Purchase Consideration RM	No. of Ivory Shares Issued
Dato' Low Eng Hock	*5,167,500	79.50	81,184,585	67,094,699
Ooi Choi Kiat	1,300,000	20.00	20,423,795	16,879,169
Dato' Seri Nazir Ariff Bin Mushir Ariff	*32,500	0.50	510,595	421,979
Total	6,500,000	100.00	102,118,975	84,395,847

Note:-

* After the transfer of 617,500 ordinary shares of RM1.00 each in IASB by Dato' Seri Nazir Ariff Bin Mushir Ariff to Dato' Low Eng Hock on 5 November 2009.

(b) Acquisition of IMSB

We had entered into a conditional share sale agreement dated 21 May 2007 and supplemental agreements dated 10 November 2008, 14 September 2009 and 12 November 2009 respectively with Dato' Low Eng Hock, Dato' Seri Nazir Ariff Bin Mushir Ariff and Othaman @ Osman Bin Kallahan to acquire the entire issued and paid-up share capital of IMSB comprising 1,000,000 ordinary shares of RM1.00 each for a purchase consideration of RM8,296,299 satisfied wholly by the issuance of 6,856,445 new Shares in our Company at an issue price of RM1.21 per Share. The purchase consideration of IMSB was based on the audited NTA of IMSB as at 31 December 2008 of RM8,296,299.

The shareholdings of IMSB's vendors in our Company pursuant to the Acquisition of IMSB are as follows:-

Shareholders	No. of Ordinary Shares of RM1.00 Each Held in IMSB	Equity Interest %	Purchase Consideration RM	No. of Ivory Shares Issued
Dato' Low Eng Hock	*842,500	84.25	6,989,632	5,776,555
Dato' Seri Nazir Ariff Bin Mushir Ariff	*7,500	0.75	62,222	51,423
Othaman @ Osman Bin Kallahan	150,000	15.00	1,244,445	1,028,467
Total	1,000,000	100.00	8,296,299	6,856,445

Note:-

* After the transfer of 142,500 ordinary shares of RM1.00 each in IMSB by Dato' Seri Nazir Ariff Bin Mushir Ariff to Dato' Low Eng Hock on 5 November 2009.

4. INFORMATION ON OUR GROUP (Cont'd)

(c) Acquisition of ISSB

We had entered into a conditional share sale agreement dated 21 May 2007 and supplemental agreements dated 10 November 2008, 14 September 2009 and 12 November 2009 respectively with Dato' Low Eng Hock, Dato' Teh Yeong Keat and Dato' Seri Nazir Ariff Bin Mushir Ariff to acquire the entire issued and paid-up share capital of ISSB comprising 1,920,000 ordinary shares of RM1.00 each for a purchase consideration of RM8,727,778 satisfied wholly by the issuance of 7,213,040 new Shares in our Company at an issue price of RM1.21 per Share. The purchase consideration of ISSB was based on the adjusted NTA of ISSB as at 31 December 2008 after taking into account the adjustment to the fair value (net of deferred taxation) of certain properties of ISSB as set out below:-

	RM
Audited NTA of ISSB as at 31 December 2008	3,610,777
Add: Fair value adjustment to certain properties of ISSB (net of deferred taxation)	# 5,117,001
Adjusted NTA of ISSB as at 31 December 2008	<u>8,727,778</u>

Note:-

The fair value adjustment arising from the revaluation of the properties of ISSB is as set out below:-

	(A) Market Value as at 30 April 2008* RM	(B) Net Book Value as at 30 April 2008 RM	(C = A - B) Gross Surplus RM	(D) Deferred Taxation RM	(E = C - D) Net Surplus RM
ISSB	15,402,822	8,487,956	6,914,866	1,797,865	5,117,001

* The revaluation of the properties is based on market value as appraised by the Independent Registered Valuers, Messrs Henry Butcher Malaysia (Penang) Sdn Bhd and Henry Butcher Malaysia (Seberang Perai) Sdn Bhd on 30 April 2008 based on the Comparison Method, Investment Method and Residual Method of Valuation. Please refer to Sections 8 and 12 of this Prospectus for further details on valuation of the properties.

The shareholdings of ISSB's vendors in our Company pursuant to the Acquisition of ISSB are as follows:-

Shareholders	No. of Ordinary Shares of RM1.00 Each Held in ISSB	Equity Interest %	Purchase Consideration RM	No. of Ivory Shares Issued
Dato' Low Eng Hock	*1,525,500	79.45	6,934,492	5,730,986
Dato' Teh Yeong Keat	380,000	19.79	1,727,373	1,427,581
Dato' Seri Nazir Ariff Bin Mushir Ariff	*14,500	0.76	65,913	54,473
Total	1,920,000	100.00	8,727,778	7,213,040

Note:-

* After the transfer of 275,500 ordinary shares of RM1.00 each in ISSB by Dato' Seri Nazir Ariff Bin Mushir Ariff to Dato' Low Eng Hock on 5 November 2009.

4. INFORMATION ON OUR GROUP (Cont'd)**(d) Acquisition of IPMSB**

We had entered into a conditional share sale agreement dated 21 May 2007 and supplemental agreements dated 10 November 2008, 14 September 2009 and 12 November 2009 respectively with Dato' Low Eng Hock and Ooi Choi Kiat to acquire the entire issued and paid-up share capital of IPMSB comprising 100,000 ordinary shares of RM1.00 each for a purchase consideration of RM222,422 satisfied wholly by the issuance of 183,820 new Shares in our Company at an issue price of RM1.21 per Share. The purchase consideration of IPMSB was based on the audited NTA of IPMSB as at 31 December 2008 of RM222,422.

The shareholdings of IPMSB's vendors in our Company pursuant to the Acquisition of IPMSB are as follows:-

Shareholders	No. of Ordinary Shares of RM1.00 Each Held in IPMSB	Equity Interest %	Purchase Consideration RM	No. of Ivory Shares Issued
Dato' Low Eng Hock	70,000	70.00	155,695	128,674
Ooi Choi Kiat	30,000	30.00	66,727	55,146
Total	100,000	100.00	222,422	183,820

(e) Acquisition of G&A

We had entered into a conditional share sale agreement dated 14 September 2009 and a supplemental agreement dated 12 November 2009 with Dato' Low Eng Hock, Chow Kah Hoong and Loh Chin Chuen to acquire the entire issued and paid-up share capital of G&A comprising 100,000 ordinary shares of RM1.00 each for a purchase consideration of RM495,081 satisfied wholly by the issuance of 409,158 new Shares in our Company at an issue price of RM1.21 per Share. The purchase consideration of G&A was based on the audited NTA of G&A as at 31 December 2008 of RM495,081.

The shareholdings of G&A's vendors in our Company pursuant to the Acquisition of G&A are as follows:-

Shareholders	No. of Ordinary Shares of RM1.00 Each Held in G&A	Equity Interest %	Purchase Consideration RM	No. of Ivory Shares Issued
Dato' Low Eng Hock	*90,000	90.00	445,573	368,242
Chow Kah Hoong	5,000	5.00	24,754	20,458
Loh Chin Chuen	5,000	5.00	24,754	20,458
Total	100,000	100.00	495,081	409,158

Note:-

- * After the transfer of equity interest of 15% comprising 15,000 ordinary shares of RM1.00 each in G&A by Chok Keng Vui to Dato' Low Eng Hock on 17 August 2009.

4. INFORMATION ON OUR GROUP (Cont'd)

(f) Acquisition of 40% IGSB

We had entered into a conditional share sale agreement dated 21 May 2007 and supplemental agreements dated 10 November 2008, 14 September 2009 and 12 November 2009 respectively with Dato' Low Eng Hock, Dato' Tan Yew Thong, Othaman @ Osman Bin Kallahan and Dato' Seri Nazir Ariff Bin Mushir Ariff to acquire 40% of the issued and paid-up share capital of IGSB comprising 1,200,000 ordinary shares of RM1.00 each for a purchase consideration of RM49,425,357 satisfied wholly by the issuance of 40,847,403 new Shares in our Company at an issue price of RM1.21 per Share. The purchase consideration of IGSB was based on the adjusted NTA of IGSB as at 31 December 2008 after taking into account the adjustment to the fair value (net of deferred taxation) of certain properties of IGSB as set out below:-

	RM
40% of the audited NTA of IGSB as at 31 December 2008	⁽ⁱ⁾ 23,053,642
Add: 40% of the fair value adjustment to certain properties of IGSB (net of deferred taxation)	⁽ⁱⁱ⁾ 26,371,715
Adjusted NTA of IGSB as at 31 December 2008	<u>49,425,357</u>

Notes:-

- (i) The audited NTA of IGSB as at 31 December 2008 is RM57,634,106.
(ii) The fair value adjustment arising from the revaluation of the properties of IGSB (net of deferred taxation) is RM65,929,288 as detailed in Note # of Section 4.2(ii)(a) above.

The shareholdings of IGSB's vendors in our Company pursuant to the Acquisition of 40% IGSB are as follows:-

Shareholders	No. of Ordinary Shares of RM1.00 Each Held in IGSB	Equity Interest %	Purchase Consideration RM	No. of Ivory Shares Issued
Dato' Low Eng Hock	*685,500	22.85	28,234,235	23,334,079
Dato' Tan Yew Thong	360,000	12.00	14,827,607	12,254,221
Othaman @ Osman Bin Kallahan	150,000	5.00	6,178,170	5,105,925
Dato' Seri Nazir Ariff Bin Mushir Ariff	*4,500	0.15	185,345	153,178
Total	1,200,000	40.00	49,425,357	40,847,403

Note:-

- * After the transfer of 85,500 ordinary shares of RM1.00 each in IGSB by Dato' Seri Nazir Ariff Bin Mushir Ariff to Dato' Low Eng Hock on 5 November 2009.

4. INFORMATION ON OUR GROUP (Cont'd)

(g) Acquisition of IISB

We had entered into a conditional share sale agreement dated 14 September 2009 and a supplemental agreement dated 12 November 2009 with Dato' Low Eng Hock and Loh Chin Chuen to acquire the entire issued and paid-up share capital of IISB comprising 250,000 ordinary shares of RM1.00 each for a purchase consideration of RM228,378 satisfied wholly by the issuance of 188,742 new Shares in our Company at an issue price of RM 1.21. The purchase consideration of IISB was based on the audited NTA of IISB as at 31 December 2008 of RM228,378.

The shareholdings of IISB's vendors in our Company pursuant to the Acquisition of IISB are as follows:-

Shareholders	No. of Ordinary Shares of RM1.00 Each Held in IISB	Equity Interest %	Purchase Consideration RM	No. of Ivory Shares Issued
Dato' Low Eng Hock Loh Chin Chuen	237,500 *12,500	95.00 5.00	216,959 11,419	179,305 9,437
Total	250,000	100.00	228,378	188,742

Note:-

* After the transfer of equity interest of 5% comprising 12,500 ordinary shares of RM1.00 each in IISB by Chok Keng Vui to Loh Chin Chuen on 17 August 2009.

(h) Acquisition of IFSB

We had entered into a conditional share sale agreement dated 21 May 2007 and supplemental agreements dated 10 November 2008, 14 September 2009 and 12 November 2009 respectively with Dato' Low Eng Hock, Othaman @ Osman Bin Kallahan and Dato' Teh Yeong Keat to acquire the entire issued and paid-up share capital of IFSB comprising 100,000 ordinary shares of RM1.00 each for a purchase consideration of RM59,247 satisfied wholly by the issuance of 48,964 new Shares in our Company at an issue price of RM1.21 per Share. The purchase consideration of IFSB was based on the audited NTA of IFSB as at 31 December 2008 of RM59,247.

The shareholdings of IFSB's vendors in our Company pursuant to the Acquisition of IFSB are as follows:-

Shareholders	No. of Ordinary Shares of RM1.00 Each Held in IFSB	Equity Interest %	Purchase Consideration RM	No. of Ivory Shares Issued
Dato' Low Eng Hock	85,000	85.00	50,360	41,620
Othaman @ Osman Bin Kallahan	10,000	10.00	5,925	4,896
Dato' Teh Yeong Keat	5,000	5.00	2,962	2,448
Total	100,000	100.00	59,247	48,964

4. INFORMATION ON OUR GROUP (Cont'd)

(i) Acquisition of ITSSB

We had entered into a conditional share sale agreement dated 14 September 2009 with Dato' Low Eng Hock and Loh Chin Chuen to acquire the entire issued and paid-up share capital of ITSSB comprising 2 ordinary shares of RM1.00 each for a cash consideration of RM2. The purchase consideration of ITSSB was based on the cost of investment of the vendors in ITSSB of RM2 and was satisfied via internally generated funds.

Details of the Acquisition of ITSSB are as follows:-

Shareholders	Date of Investment	No. of Ordinary Shares of RM1.00 Each Held in ITSSB	Equity Interest %	Purchase Consideration RM	Cash Consideration RM
Dato' Low Eng Hock	09.10.2007	1	50.00	1	1
Loh Chin Chuen	17.08.2009	*1	50.00	1	1
Total		2	100.00	2	2

Note:-

* After the transfer of equity interest of 50% comprising 1 ordinary share of RM1.00 each in ITSSB by Chok Keng Vui to Loh Chin Chuen on 17 August 2009.

(j) Acquisition of IUSB

We had entered into a conditional share sale agreement dated 14 September 2009 with Dato' Low Eng Hock, and Loh Chin Chuen to acquire the entire issued and paid-up share capital of IUSB comprising 2 ordinary shares of RM1.00 each for a cash consideration of RM2. The purchase consideration of IUSB was based on the cost of investment of the vendors in IUSB of RM2 and was satisfied via internally generated funds.

Details of the Acquisition of IUSB are as follows:-

Shareholders	Date of Investment	No. of Ordinary Shares of RM1.00 Each Held in IUSB	Equity Interest %	Purchase Consideration RM	Cash Consideration RM
Dato' Low Eng Hock	06.10.2008	1	50.00	1	1
Loh Chin Chuen	17.08.2009	*1	50.00	1	1
Total		2	100.00	2	2

Note:-

* After the transfer of equity interest of 50% comprising 1 ordinary share of RM1.00 each in IUSB by Chok Keng Vui to Loh Chin Chuen on 17 August 2009.

4. INFORMATION ON OUR GROUP (Cont'd)

(k) Acquisition of Sunlink

We had entered a into conditional share sale agreement dated 14 September 2009 with Dato' Low Eng Hock, Dato' Seri Nazir Ariff Bin Mushir Ariff and Loh Chin Chuen to acquire the entire issued and paid-up share capital of Sunlink comprising 100,000 ordinary shares of RM1.00 each for a cash consideration of RM100,000. The purchase consideration of Sunlink was based on the cost of investment of the vendors in Sunlink of RM100,000 and was satisfied via internally generated funds.

Details of the Acquisition of Sunlink are as follows:-

Shareholders	Date of Investment	No. of Ordinary Shares of RM1.00 Each Held in Sunlink	Equity Interest %	Purchase Consideration RM	Cash Consideration RM
Dato' Low Eng Hock	01.04.2009	90,000	90.00	90,000	90,000
Dato' Seri Nazir Ariff Bin Mushir Ariff	01.04.2009	5,000	5.00	5,000	5,000
Loh Chin Chuen	17.08.2009	5,000	5.00	5,000	5,000
Total		100,000	100.00	100,000	100,000

(l) Acquisition of ICSB

We had entered into a conditional share sale agreement dated 21 May 2007 and supplemental agreements dated 10 November 2008, 14 September 2009 and 12 November 2009 respectively with Dato' Low Eng Hock to acquire 49% of the issued and paid-up share capital of ICSB comprising 980,000 ordinary shares of RM1.00 each for a purchase consideration of RM214,647 satisfied by the issuance of 177,394 new Shares in our Company at the issue price of RM1.21 per Share. The purchase consideration of ICSB was based on the audited NTA of ICSB as at 31 December 2008.

The shareholding of ICSB's vendor in our Company pursuant to the Acquisition of ICSB is as follows:-

Shareholder	No. of Ordinary Shares of RM1.00 Each Held in ICSB	Equity Interest %	Purchase Consideration RM	No. of Ivory Shares Issued
Dato' Low Eng Hock	980,000	49.00	214,647	177,394
Total	980,000	49.00	214,647	177,394

4. INFORMATION ON OUR GROUP (Cont'd)

(m) Acquisition of IVSB

We had entered into a conditional share sale agreement dated 21 May 2007 and supplemental agreements dated 10 November 2008, 14 September 2009 and 12 November 2009 respectively with Dato' Low Eng Hock to acquire 49% of the issued and paid-up share capital of IVSB comprising 490,000 ordinary shares of RM1.00 each for a purchase consideration of RM943,851 satisfied by the issuance of 780,042 new Shares in our Company at an issue price of RM1.21 per Share. The purchase consideration of IVSB was based on the audited NTA of IVSB as at 31 December 2008.

The shareholding of IVSB's vendor in our Company pursuant to the Acquisition of IVSB is as follows:-

Shareholder	No. of Ordinary Shares of RM1.00 Each Held in IVSB	Equity Interest %	Purchase Consideration RM	No. of Ivory Shares Issued RM
Dato' Low Eng Hock	490,000	49.00	943,851	780,042
Total	490,000	49.00	943,851	780,042

(n) Acquisition of 60% IGSB

We had entered into a conditional share sale agreement dated 21 May 2007 with IASB to acquire 60% of the issued and paid-up share capital of IGSB comprising 1,800,000 ordinary shares of RM1.00 each for a cash consideration of RM1,800,000. The purchase consideration of IGSB was based on the cost of investment of IASB in IGSB from June 2003 to August 2005 of RM1,800,000 and was satisfied via internally generated funds.

The Acquisition of 60% IGSB was undertaken upon completion of the Acquisition of IASB, Acquisition of IMSB, Acquisition of ISSB, Acquisition of IPMSB, Acquisition of G&A, Acquisition of 40% IGSB, Acquisition of IISB, Acquisition of IFSB, Acquisition of ITSSB, Acquisition of IUSB, Acquisition of Sunlink, Acquisition of ICSB and Acquisition of IVSB.

The Acquisitions via Share Swap resulted in our issued and paid-up share capital being increased from 4 Shares to 141,100,859 Shares.

The new Shares issued pursuant to the Acquisitions via Share Swap ranked pari passu in all respect with our existing Shares, except that the new Shares will not be entitled to any dividend, rights, allotment or other distribution, the entitlement date of which is prior to the date of allotment of the said Shares.

The Acquisitions were completed on 11 March 2010.

4. INFORMATION ON OUR GROUP (Cont'd)

(iii) Rights Issue

Upon completion of the Acquisitions, we undertook a rights issue of 141 new Shares at the issue price of RM1.21 per Share to all our existing shareholders on the basis of approximately ten (10) new Shares for every existing ten million (10,000,000) Shares held in our Company after the Acquisitions via Share Swap.

The Rights Issue was completed on 15 March 2010. The Rights Issue resulted in our issued and paid-up share capital being further increased from 141,100,859 Shares to 141,101,000 Shares.

The new Shares issued pursuant to the Rights Issue ranked pari passu in all respect with our existing Shares, except that the new Shares will not be entitled to any dividend, rights, allotment or other distribution, the entitlement date of which is prior to the date of allotment of the said Shares.

(iv) IPO

(a) Public Issue

We are undertaking a Public Issue, details of which are set out in Section 2.2(i) of this Prospectus.

(b) Offer For Sale

Our Offerors are undertaking an Offer For Sale, details of which are set out in Section 2.2(ii) of this Prospectus.

(vi) Listing

Upon completion of the abovementioned Subdivision, Acquisitions, Rights Issue and IPO, we will seek a listing of and quotation for our entire enlarged issued and paid-up share capital comprising 186,000,000 Shares on the Main Market of Bursa Securities.

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4. INFORMATION ON OUR GROUP (Cont'd)

4.3 BUSINESS BACKGROUND**4.3.1 History and Development**

We were incorporated in Malaysia under the Act as a private limited company on 27 November 2004 under the name of Ivory Properties Group Sdn Bhd. Subsequently, on 14 March 2007, we converted into a public limited company and have since then assumed our present name. Our principal activity is investment holding whilst our subsidiaries are principally involved in property development and related supporting services, and property management.

Dato' Low Eng Hock is the promoter of our Group. He has been instrumental in the success, growth and development of our Group. With approximately twenty five (25) years of experience in Property Development and Building and Construction Industries, he has successfully led our Group to become an established player in the Penang's Property Development Industry.

The history of our Group can be traced back to the incorporation of IASB in 1999. The business activity of IASB is in property development and building and construction. In 1999, our Group started to embark on the development of Tanjung Park in Penang Island, which was completed in 2003. Tanjung Park comprised of 285 units in two 22-storey condominiums (excluding car parks and facilities) and 14 units of townhouses. In 1999, ICSB, an associated company, was incorporated as a property development business unit of our Group. In 2004, ICSB signed an agreement with the landowner, Alam Harmoni Sdn Bhd, for the future development of Island Resort project in Penang Island, a mixed residential and hospitality development.

In 1999, IMSB, focusing on property development was incorporated. In 2001, IMSB started to embark on the development of Moonlight Bay project, a mixed residential development in Batu Feringgi in Penang Island.

In 2000, when ISSB was incorporated as our Group's property development business unit, ISSB commenced the development of two (2) property projects, Palace Hill and Plaza Ivory. Palace Hill consists of 40 units of landed property and Plaza Ivory featured approximately 65,000 square feet of commercial space and 272 of condominium units. In 2004, ISSB completed the development and construction of Palace Hill and Plaza Ivory. As part of our Group's business expansion plan to diversify into supporting services, G&A was incorporated in 2000 to provide engineering and architectural consultancy for in-house requirements as well as to service external customers. In 2000, IPMSB was incorporated to provide property management services incorporating building maintenance, cleaning, landscaping and security services.

In 2001, our Group incorporated IGSB, which is involved in property development. IGSB held approximately 13 acres of land in Georgetown, Penang and in 2004, IGSB started to embark on the development of Penang Times Square, an "urban village" comprising residential, retail, hotel and entertainment developments. In 2005, IGSB commenced the construction of Phase 1 of Penang Times Square, located in the city centre of Georgetown. IVSB, an associated company, was incorporated in 2001 and is primarily involved in property development for two (2) blocks of condominium in Penang called The View Twin Towers. In 2003, IVSB started to embark on the development of The View Twin Towers, which comprised of two 30-storey condominiums (excluding car parks and facilities) with a total of 164 units on a 2.6 acres land. The construction of The View Twin Towers commenced in 2004 and was completed in 2006.

4. INFORMATION ON OUR GROUP (Cont'd)

In 2002, IISB was incorporated as a property development business unit of our Group. IFSB was incorporated in 2003 to provide interior design services and interior fit-out, and renovation works. In line with our Group's emphasis on quality, IASB and G&A were accredited with ISO 9001:2000 on 11 January 2006 and were upgraded to ISO 9001:2008 on 23 November 2009 and 2 December 2009 respectively whilst IPMSB was accredited with ISO 9001:2000 on 30 April 2009 and was upgraded to ISO 9001:2008 on 9 March 2010.

In 2007, ITSSB was incorporated and primarily focus on property management. In 2008, IUSB was incorporated to be principally involved in provision of utilities services whilst Sunlink was incorporated to undertake food services operations. Currently Sunlink operates two (2) franchised "Marry Brown" outlets in Penang.

With approximately eleven (11) years of experience in Property Development, our Group has established a track record as a reputable and quality developer in Penang.

In the course of our Group's history up to the LPD, there were no material changes in the mode of conducting our Group's business and there were no material changes in the types of products produced or services rendered. In the course of our Group's history, there were no acquisitions or disposals of material assets other than in the ordinary course of business and our Group was not involved in any bankruptcy, receivership or similar proceedings.

Please refer to Section 4.4.3 of this Prospectus for the status of the abovementioned property development projects.

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4. INFORMATION ON OUR GROUP (Cont'd)

4.3.2 Our Key Achievements, Milestones, Awards and Accreditations

Our Group has obtained the following awards and accreditations:-

(i) Quality Recognition

Companies	Accreditations	Date Obtained	Endorsed/ Accredited/ Organised by
IPMSB	ISO 9001:2000	30 April 2009	BM Trada Certification
	ISO 9001:2008	9 March 2010	
IASB	ISO 9001:2000	11 January 2006	BM Trada Certification
	ISO 9001:2008	23 November 2009	
G&A	ISO 9001:2000	11 January 2006	BM Trada Certification
	ISO 9001:2008	2 December 2009	

(ii) Enterprise Awards

Companies	Accreditations	Date Obtained	Endorsed/ Accredited/ Organised by
Ivory	Asia Pacific Commercial Property Awards in association with Bloomberg Television 2010 – Highly Commended Best Mixed Use Development Malaysia (Penang Times Square)	2010	International Property Awards
Ivory	Trane Energy Efficiency Leader Award 2010 for Environmental Sustainability, Energy and Operational Efficiency (Penang Times Square)	April 2010	Trane
IASB	Asia Pacific Super Excellent Brand 2008	2008	Asia Entrepreneur Alliance Worldwide
IASB	The Malaysian Construction Industry Excellence Awards	2008	CIDB Malaysia
IASB	Enterprise Awards Malaysia 2007 – Platinum Award Winner for 1 st Top 50 Enterprise Awards Malaysia	2007	The Young Entrepreneurs Association of Malaysia (PUMM)
Ivory	The Star Property and Home Fair – Outstanding Booth Award	September 2007	The Star

4. INFORMATION ON OUR GROUP (Cont'd)

Companies	Accreditations	Date Obtained	Endorsed/ Accredited/ Organised by
IASB	Golden Bull Award – <i>Winner</i>	8 September 2007	<ul style="list-style-type: none"> • Nanyang Siang Pau Sdn Bhd; and • Ernst & Young
Ivory	In Penang My Preferred 2 nd Home Property 2007	April 2007	Market Source Publishing
Ivory	Penang International Expo 2007 - Winner of Best Decorated Booth	March 2007	PIP Creation Sdn Bhd and supported by Penang State Government with the cooperation of Penevents and Raine & Home International
Ivory	Business Superbrands Malaysia	2006	Superbrands Malaysia
IASB	Golden Bull Award – 4 th Position	26 August 2006	<ul style="list-style-type: none"> • Nanyang Siang Pau Sdn Bhd; and • Ernst & Young
ISSB	Enterprise 50	2005	<ul style="list-style-type: none"> • Small & Medium Industrial Development Corporation (SMIDEC); and • Deloitte Kassim Chan
ISSB	Golden Bull Award – <i>Winner</i>	23 September 2005	<ul style="list-style-type: none"> • Nanyang Siang Pau Sdn Bhd; and • Ernst & Young
ISSB (Awarded to Dato' Low Eng Hock)	The 4 th Asia Pacific/ Malaysia E - Entrepreneur Excellence Award – Excellence Service Quality	10 July 2005	<ul style="list-style-type: none"> • Entrepreneur Development Association (Malaysia); • Penglai Municipal Government of Shangdong of People Republic of China ("PRC"); • Yantai Investment Development Board of Shangdong of PRC; • Tongshan Municipal Government of Hebei of PRC; • Changyi Municipal Government of Shangdong of PRC; • Shang Hai Magazine; and • Global Business Magazine

4. INFORMATION ON OUR GROUP (Cont'd)

Companies	Accreditations	Date Obtained	Endorsed/ Accredited/ Organised by
Ivory	The 3 rd Asia Pacific International Honesty Enterprise – Keris Award 2004	16 January 2005	<ul style="list-style-type: none"> • Entrepreneur Development Association (Malaysia); • Penglai Municipal Government of Shangdong of PRC; • Yantai Investment Development Board of Shangdong of PRC; • Shang Hai Business Magazine; and • Global Business Magazine
ISSB	Business of the Year Award Malaysia - Category of Potential Company	2004	<ul style="list-style-type: none"> • Asia Pacific Centre for Small Medium Enterprise; and • Kwong Wah Yit Poh
ISSB	Golden Bull Award – 2 nd Position	13 August 2004	<ul style="list-style-type: none"> • Nanyang Siang Pau Sdn Bhd; and • Ernst & Young

Our Company, through our subsidiaries and associated companies, is a member of the following associations and federation:-

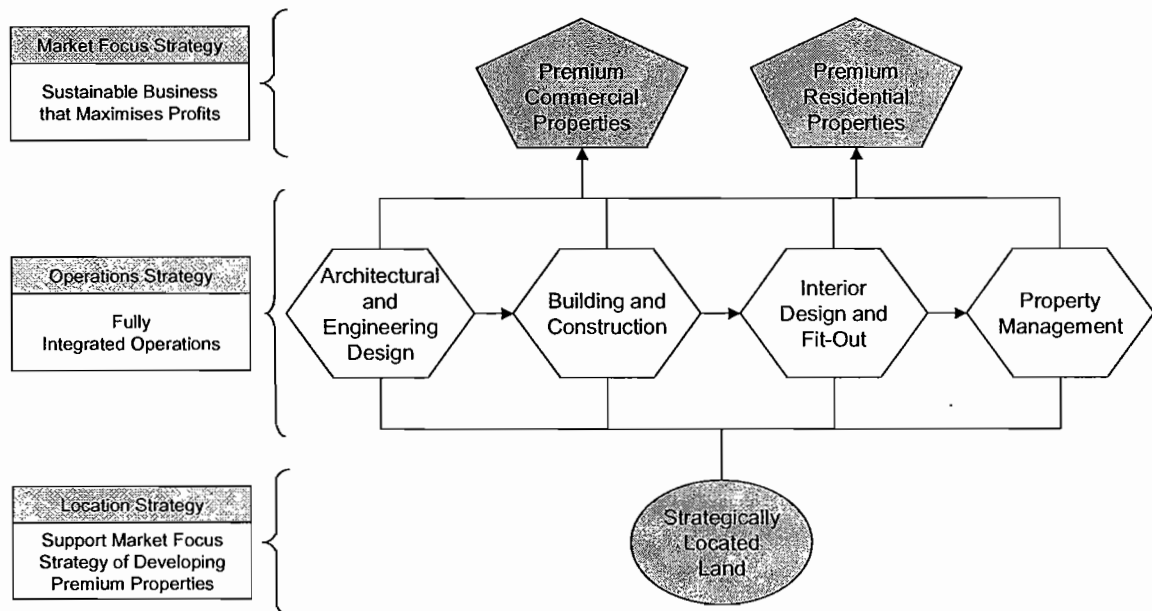
- (i) ISSB has been a member of Real Estate and Housing Developers' Association Malaysia ("**REHDA**") since 2000;
- (ii) IASB has been a member of Penang Chinese Chamber of Commerce since 2002;
- (iii) IASB is registered as an "Associate Member (Corporate Member)" of the International Real Estate Federation ("**FIABCI**") Malaysian Chapter in 2005. Subsequently, on 1 January 2006, IASB has been upgraded to "International Corporate Ordinary Member";
- (iv) IVSB has been a member of the REHDA since 2005;
- (v) Ivory has been a member of Malaysian International Chamber of Commerce and Industry since 2007; and
- (vi) IGSB has been a corporate member of Persatuan Pengurusan Kompleks Malaysia since 2009.

4. INFORMATION ON OUR GROUP (Cont'd)

4.4 OVERVIEW OF OUR GROUP'S BUSINESS ACTIVITIES

4.4.1 Business Model

Our Group's business model is based on being an integrated property developer focusing on the premium market for residential and commercial properties as depicted in the figure below:-



Our Group's business model focuses on three (3) platforms:-

- (i) Market focus strategy;
- (ii) Operations strategy; and
- (iii) Location strategy.

Our Group's market focus strategy is to excel in property segments that will provide us with a sustainable business that maximises our profits. As such, we have chosen to focus on developing premium residential and commercial properties.

Our Group's operations strategy focuses on providing the platform to support our market focus strategy and at the same time, ensuring business growth and profitability. This is achieved through being an integrated property developer where all the critical functions are undertaken in-house.

Our Group's location strategy focuses on maximising business opportunities through the development of properties in strategic locations. Developing properties in strategic locations are paramount in supporting the market focus strategy of developing premium properties.

4. INFORMATION ON OUR GROUP (Cont'd)

(i) Market Focus Strategy

Our Group's market focus strategy is based on a two-prong approach to ensure a sustainable business that maximises profits:-

- (a) Premium residential properties; and
- (b) Premium commercial properties.

Our Group's strategy to target the premium market is predicated on two (2) major considerations:-

- (a) Currently, our Group's development activities are centred in Penang Island. Penang Island with 2,446 persons per square kilometre has the second highest population density after the Federal Territory of Kuala Lumpur. To optimise from the relative scarcity of available land, our Group targets the premium market to maximise on profits.
- (b) Our Group's development philosophy is based on product innovation and quality. As such, to obtain a robust return on investment, our Group targets the premium market that offers a sufficiently high margin to ensure business profitability.

Residential and commercial properties represented the two (2) largest contributors of total property transaction value in Malaysia. The residential and commercial properties contributed approximately 47% and 19% in 2008, and 52% and 19% in the first half of 2009 respectively, of the total property transaction value in Malaysia.

The strategy to target Residential Property and Commercial Property markets will provide the following benefits to our Group:-

- (a) Market enlargement covering two (2) segments of the market to ensure a sustainable business;
- (b) Market diversification to mitigate any over-dependency on any one segment; and
- (c) Product diversification within each market segment, for example building bungalows, townhouses and condominiums within the residential segment so as to mitigate any adverse impact from any one sector within each market segment.

For the FYE 2009, our Group's revenue from Residential Property represented approximately 80.8% while Commercial Property represented approximately 15.3% of our Group's total revenue.

(ii) Operations Strategy

Our Group's operations strategy is to have a totally integrated operation where all the core functions of property development are undertaken in-house. These include the following:-

- (a) Architectural and engineering design;
- (b) Building and construction;
- (c) Interior design and fit-out; and
- (d) Property management.

4. INFORMATION ON OUR GROUP (Cont'd)

The main rationale for our integrated operations strategy is as follows:-

- (a) Enhances product quality as we provide full control of the whole property development process and supported by ISO quality accreditations;
- (b) Increases profit margin as we reduce the need to outsource any key function to third parties;
- (c) Able to create innovative and contemporary designs that appeal to our target premium market customer group facilitated by the in-house architectural and engineering design capabilities;
- (d) Faster to market as key functions are undertaken in-house which reduces external dependencies, thus facilitating better project management; and
- (e) Creates competitive advantage as many property developers outsource some or most of their key property development functions.

(iii) Location Strategy

In-line with our Group's market focus strategy of addressing the premium market segment, our Group will focus on developing properties in strategic locations.

Strategic location is synergistic with our Group's product portfolio of developing residential and commercial properties. The success in developing properties for these two (2) segments is highly dependent on the choice of location.

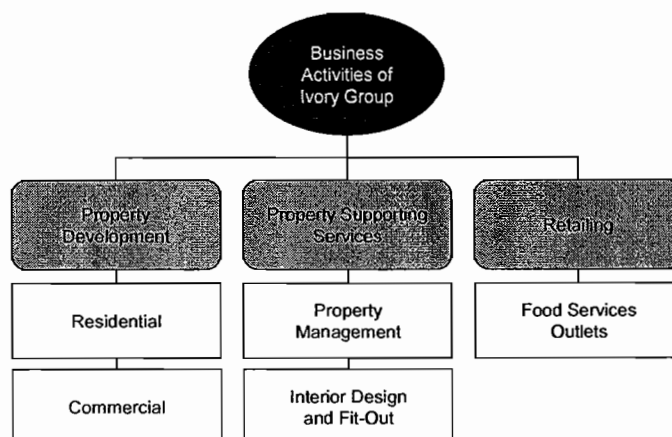
To-date, our Group's developments are focused in strategic residential and commercial locations in Penang Island. Nevertheless, our future plans will also incorporate strategic locations in mainland Penang and in neighbouring state of Perak.

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4. INFORMATION ON OUR GROUP (Cont'd)

4.4.2 Types of Products and/or Services

The business activities of our Group are depicted in the figure follows:-



Our Group is an integrated property developer and our core business activities include the following:-

- (i) Property development;
- (ii) Property supporting services; and
- (iii) Retailing.

Recently, we entered into the retailing of food services, focusing on quick service restaurants. The quick service restaurants are operated under the brand name of "Marry Brown". Currently, our Group is a franchisee of "Marry Brown".

As an integrated property developer, we have the in-house capabilities to undertake the full aspect of property development that incorporates the following key functions:-

- (i) Development planning;
- (ii) Architectural and engineering design;
- (iii) Building and construction;
- (iv) Interior design and fit-out; and
- (v) Property management.

As an integrated property developer, our Group is able to control all aspects of product innovation, development quality, prompt completion and full project management. In addition, we are able to increase our profit margin as key functions are undertaken in-house and not outsourced to third parties.

4. INFORMATION ON OUR GROUP (Cont'd)

The breakdown of our Group's revenue by business activities for the FYE 2009 are as follows:-

Business Activities	Revenue	
	RM'000	%
Property Development	116,281	96.1
- Residential	97,786	80.8
- Commercial	18,495	15.3
Property Supporting Services	3,790	3.1
- Property Management	2,289	1.9
- Interior Design and Fit-Out	1,501	1.2
Retailing	946	0.8
Total	121,017	100.0

Note:-

For the FYE 2009, the revenue of our Group amounted to approximately RM121.02 million, excluding inter-company transactions. Our Group commenced retailing business in FYE 2009.

As a property developer, our Group's main revenue contribution comes from property development where for the FYE 2009, property development accounted for approximately 96.1% of our Group's total revenue.

For the FYE 2009, Residential Property accounted for the highest revenue contribution, representing approximately 80.8% of our Group's total revenue. This was mainly derived from sales of condominiums and villas.

For the FYE 2009, Commercial Property contributed to approximately 15.3% of our Group's total revenue, which amounted to approximately RM18.50 million. This was derived from the sales of retail lots from the shopping complex developed by our Group.

In addition, our Group also provided property supporting services, such as interior design and fit-out services and property management services. For the FYE 2009, interior design and fit-out services contributed to approximately 1.2% of our Group's total revenue. The remaining balance of approximately 1.9% was contributed by property management services.

(i) Property Development

Our Group is an integrated property developer.

Some of the project planning activities undertaken by our Group include:-

- (a) Urban design and planning;
- (b) Development and building conceptualisation;
- (c) Development planning;
- (d) Market analysis and feasibility studies; and
- (e) Project material, cost and time analyses.

4. INFORMATION ON OUR GROUP (Cont'd)

Our Group mainly utilises our in-house design team including architects, civil engineers, structural engineers, mechanical personnel, electrical personnel, quantity surveyors and interior designers to prepare the drawings and specifications for the developments as well as for proposal submissions to the Ministry of Housing and Local Government and other relevant authorities.

Our Group focuses on two (2) types of property developments, namely residential and commercial.

Within Residential Property developments, our Group has developed the following types of dwelling:-

- (a) Condominium;
- (b) Terrace house;
- (c) Townhouse;
- (d) Semi-detached house; and
- (e) Bungalow.

Within Commercial Property developments, our Group has developed the following types of properties:-

- (a) Retail shops;
- (b) Shop office;
- (c) Shop house; and
- (d) Shopping complex.

However, as part of our future plans, we will undertake development of additional types of commercial properties as follows:-

- (a) Recreation (example golf course);
- (b) Hospitality (example hotel and service apartment);
- (c) Exhibition and convention centre; and
- (d) Entertainment (example cinema).

(ii) Architectural and Engineering Design

As an integrated property developer, our Group has in-house capabilities to undertake architectural and engineering design to support our core business in property development. These services are undertaken by G&A. However, our architectural designs are checked and signed by a third party architect.

Architectural and engineering designs are critical for an integrated property developer as they ensure that the overall development complies with the building standards to obtain CF and occupation from local authorities. More importantly, architectural and engineering functions undertaken in-house enables our Group to carry out R&D work to create innovative, contemporary and fresh designs and products. This ability is paramount to support our Group's market focus strategy of servicing the premium market segment.

4. INFORMATION ON OUR GROUP (Cont'd)

Some of the architectural and engineering activities undertaken by our Group include the following:-

(a) Planning covering:-

- Development planning;
- Project feasibility study;
- Urban and regional planning;
- Land use planning and documentation; and
- Types of properties development.

(b) Architectural and engineering design works including:-

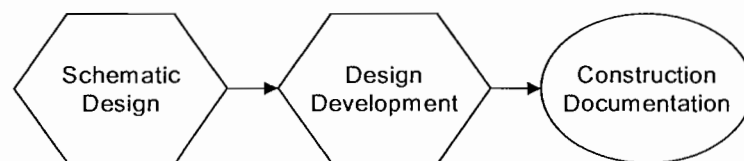
- Schematic design;
- Building and structural design;
- Infrastructure planning and design;
- Steel and reinforced concrete design;
- Advanced mechanical system design;
- Structural steel design; and
- Architectural model making.

(c) Landscaping design including:-

- Space and topography analysis;
- Layout design;
- Selection of plants;
- Identification of ornamental structures; and
- Public amenities.

(d) Documentation and submission of various proposals and plans to relevant authorities.

There are various phases within architectural services that are carried out by our Group's in-house technical personnel. The various phases are depicted as follows:-



(a) **Schematic Design**

This stage requires the planning team to analyse the project requirements with engineers and architects. The preparation of schematic design consists of drawings, consideration of structures and materials to be used. The main objective of this is to explore alternative design solutions to provide a reasonable basis for analysing cost of the project.

4. INFORMATION ON OUR GROUP (Cont'd)

(b) Design Development

During the design development, the design team will work out a clear and coordinated description of all aspects of the design. This includes fully developed floor plans, sections, exterior elevations and for particular areas or aspects of building, interior elevations, reflected ceiling plans, wall sections and key details.

These items are presented to scale that minimises the possibility of major modifications during the construction documentation phase and become the basis for the construction documents that follow.

The basic mechanical, electrical, plumbing and fire protection systems are also required to be accurately defined.

(c) Construction Documentation

The construction documentation phase includes the preparation of drawings and specifications that describe in technical details the construction work to be done. It also includes the materials, equipment, workmanship and finishes, architectural, structural, mechanical and electrical works, as well as site work and utility connections.

(iii) Building and Construction

Part of our Group's property development activities involves building and construction. IASB undertakes all building and construction works for our Group.

The building and construction works include:-

- (a) Project planning and management;
- (b) Procurement;
- (c) Construction of buildings and structures;
- (d) Mechanical and electrical works;
- (e) Civil works;
- (f) Landscaping; and
- (g) Monitoring, site inspection and supervision.

The Group through IASB, is registered with the CIDB as a G7 contractor under the categories of civil engineering construction and building construction as detailed in Section 4.18.8(i)(b) of this Prospectus.

As a G7 contractor, our Group is able to carry out civil engineering construction and building construction works with no limitation as to the size of the project.

4. INFORMATION ON OUR GROUP (Cont'd)

Some of the construction activities undertaken by our Group include:-

- (a) Onsite preparation activities prior to site alteration such as surveying, clearing of vegetation, placement of stakes and flagging guides, and movements of machine and equipment;
- (b) Construction of access roads which may entail clearing and grubbing, sub-grade stabilisation, base course construction and paving;
- (c) Establishment of construction staging area, such as heavy equipment to be delivered to the site, fuelled, maintained and stored in temporary facilities when not in use;
- (d) Arrangement for material storage such as soil, rocks and other building materials that must be hauled and stored at the site;
- (e) Site preparation such as removal of surface vegetation and major root systems, and also discharge of water for concrete washout, pumping for work area isolation and washing vehicles;
- (f) Earthworks such as grading, excavating, backfilling and compaction, base course, soil stabilisation, slope protection and soil treatment;
- (g) Site restoration and clean-up such as protection of bare earth by seeding, planting, mulching and fertilising;
- (h) Foundation works such as piling and caissons installation;
- (i) Sewage and drainage;
- (j) Reservoir and water reticulation works;
- (k) Construction of buildings and structures;
- (l) Paving such as walkways, roads and parking areas, curbs, and surfacing; and
- (m) Landscaping.

Our Group also sub-contracts some of our construction work to external parties, including:-

- (a) Carpentry;
- (b) Tiling;
- (c) Roadworks;
- (d) Plumbing and sanitary;
- (e) Electrical and mechanical;
- (f) Air conditioning; and
- (g) Landscaping.

4. INFORMATION ON OUR GROUP (Cont'd)

(iv) Interior Design and Fit-Out

Interior design and fit-out are undertaken by IFSB. For the FYE 2009, interior design and fit-out works accounted for approximately 1.2% of our Group's total revenue, amounting to approximately RM1.50 million.

(a) Interior Design

The interior design process commonly follows a systematic and coordinated methodology, including research, analysis and integration of knowledge into creative processes, whereby the needs and requirements of the customers are satisfied to produce an interior space that fulfils the requirements.

Some of the interior design services carried out by our Group include the following:-

- Research and analysis of the overall concept and requirements, and development of drawings and diagrams that outline the needs;
- Formulation of preliminary space plans with two and three dimensional design concept, studies and sketches that integrate all the needs based on knowledge of the principles of interior design;
- Confirmation that the preliminary space plans and design concepts are safe, functional and aesthetically appropriate;
- Selection of colours, materials and finishing to suitably convey the design concept, and to meet functional, life-cycle and safety requirements;
- Selection or specification of furniture, fixtures, fittings, equipment and millwork, including layout drawings and detail product descriptions, and provision of documentation to facilitate pricing, procurement and installation of furniture; and
- Coordination and collaboration with other professionals and technical personnel such as architects and structural, mechanical and electrical engineers.

Most of our Group's interior design services are provided to external party customers. However, our Group also uses these services internally.

4. INFORMATION ON OUR GROUP (Cont'd)

(b) Interior Fit-Out

Generally, interior fit-out is segmented into the following categories:-

- New development – interior fit-out undertaken for new buildings or premises; and
- Renovation and refurbishment – Revamping including upgrading existing interiors of established buildings or premises.

The main interior fit-out activities undertaken by our Group includes procurement of materials and finished products, installation and construction. However, we outsource the physical fit-out work to third party contractors.

Some of the common activities and responsibilities undertaken by our Group include the following:-

- Partitions;
- Plumbing;
- Lightings;
- Electrical wiring;
- Signage;
- Telecommunications wiring;
- Flooring;
- Environment climate control;
- Ceiling;
- Furniture, furnishing and fittings;
- Walling;
- Colour scheme;
- Insulation; and
- Painting.

(v) Property Management

Property management is undertaken by IPMSB. Property management provides synergy to our Group's core business activity and enables our Group to provide a one-stop total property development solution especially for enclosed type residential and commercial properties.

Our Group currently manages the following properties in Penang:-

No.	Project	Period
1.	Seri Taman Tanjung – Apartments	August 2003 - Present
2.	Plaza Ivory – Commercial	November 2004 - Present
3.	The View Twin Towers – Condominium	January 2007 - Present
4.	Penang Times Square (Phase 1) – Condominium and shopping complex	January 2009 - Present

4. INFORMATION ON OUR GROUP (Cont'd)

The joint management body or management corporation comprising of elected resident's committee members will take over the management of the properties as listed above should our Group cease to provide property management services to the said properties.

Some of the property management services provided by our Group include:-

- (a) Maintenance services including scheduled preventive maintenance and routine maintenance program for building systems, facilities, streets, sidewalks, lawn and others;
- (b) 24-hour security services including manning the guard house;
- (c) Ground and janitorial services such as sweeping the parking lots, streets, common stairways and walkways, and cleaning the roof, gutters and down spouts;
- (d) Landscape maintenance services;
- (e) Repair services, including HVAC (heating, ventilation and air-conditioning) repair and replacement, lighting replacement, plumbing, sewerage and structural works; and
- (f) Refurbishment services including repainting and replacement of outdoor furniture and fixtures.

Although our Group is responsible for all the property management functions, we use a combination of in-house resources and external contractors to provide the full diverse range of services as it is not economical to undertake all functions.

For the FYE 2009, revenue contributed by property management operations accounted for approximately 1.9% of our Group's total revenue, which amounted to approximately RM2.29 million.

(vi) Retailing of Food Services Outlets

Our Group ventured into retailing of food services outlets in April 2009. Our Group primarily focused on fast food restaurants and currently has two (2) outlets in Penang. By venturing into retailing of food services outlets, our Group has the opportunity to expose ourselves and participate in commercial activities as a business unit in the shopping complex. Furtherance, our Group will be able to maximise the use of our shoplots and generate recurring incomes.

Our Group operates as a franchisee to third party brand owners. As a franchisee, our Group gains access to the franchiser's branding, marketing, operational know-how and other intellectual properties.

Our Group has on 2 February 2009 and 23 March 2009 respectively entered into two franchising agreements with Marrybrown Fried Chicken Sdn Bhd, for the operation of fast food outlets under the brand name "Marry Brown" serving fried chicken.

4. INFORMATION ON OUR GROUP (Cont'd)

4.4.3 Our Property Development Projects

(i) Completed Projects

By Our Subsidiaries

The completed projects developed by our subsidiaries are as follows:-

(a) Plaza Ivory and Palace Hill

In 2000, our Group via ISSB started to embark on the development of two (2) projects, Plaza Ivory and Palace Hill.

The following are the different types of development for the Plaza Ivory and Palace Hill projects:-

Type of Development	Units Developed [#]	Units Sold [#]	Gross Area [#] (square feet)	Net Sale Value [#] RM'000
Palace Hill				
Semi-detached house	36	36	2,800 - 4,888	32,406
Bungalow	4	4	3,008 - 5,016	6,301
Plaza Ivory				
Condominium	272	272		57,112
• Typical unit	260	260	900 – 1,000	51,155
• Penthouse	12	12	1,882 – 2,152	5,957
Shop office/ house [^]	38	38	700 – 1,640	13,052
2-storey retail shop	56	50	350 – 1,313	14,664

[^] 2-storey shop office plus 1-storey studio apartment; and
[#] As at the LPD.

Some of the additional facilities developed by our Group for Plaza Ivory condominium included:-

- Gymnasium;
- Swimming and wading pool;
- Basket ball court;
- Children playground;
- Landscaped garden;
- Visitor lounge;
- Multi purpose hall; and
- Others (including barbecue pit, changing room, outdoor court).

The development cost of the Palace Hill and Plaza Ivory projects was approximately RM103.50 million. The Palace Hill and Plaza Ivory were completed and obtained CF in 2004.

4. INFORMATION ON OUR GROUP (Cont'd)

(b) Penang Times Square - Phase 1

Penang Times Square is based on an "urban village in a city centre" concept where it incorporates a diverse and comprehensive range of developments that makes it a virtual self-contained "village".

Developments/ proposed developments within Penang Times Square undertaken by IGSB include the following:-

- Residential – Condominiums;
- Retail and entertainment - Shopping complexes and cinemas;
- Hospitality – Hotel; and
- Public amenities - Exhibition and convention centre.

The Penang Times Square project is segregated into four (4) phases as follows:-

Phase	Name of Development	Type of Property
Phase 1 ⁽ⁱ⁾	Birch The Plaza	20-storey condominium ⁽ⁱⁱ⁾
		5-storey shopping complex ⁽ⁱⁱ⁾
Phase 2 ⁽ⁱ⁾	Birch Regency	21-storey condominium ⁽ⁱⁱ⁾
		6-storey shopping complex ⁽ⁱⁱ⁾⁽ⁱⁱⁱ⁾
Phase 3 ^{(i)(iv)}	-	2 blocks of 20-storey condominium ^(iv)
		11-storey shopping complex including exhibition and convention centre ⁽ⁱⁱ⁾
Phase 4 ⁽ⁱ⁾	-	16-storey hotel (with 352 rooms) ⁽ⁱⁱ⁾
		5-storey hotel podium with commercial space
		6-storey commercial building

(i) Phase 1 - completed, Phase 2 - on-going, Phase 3 and Phase 4 - future projects;

(ii) Excluding car parks and facilities located in the podium;

(iii) Including two (2) levels of basement; and

(iv) Future planning and subject to approval being obtained from the authorities.

The following are the details of some of the types of property for Penang Times Square - Phase 1:-

Type of Development	Units Launched*	Units Sold*	Built-up Area* (square feet)	Net Sale Value* (RM'000)
Birch the Plaza				
Condominium	417	412		133,623
• Typical unit	394	389	1,010 – 1,180	118,959
• Duplex	1	1	2,040	808
• Penthouse	22	22	1,750 – 2,300	13,856
Shopping complex				
• Retail lots	203	160	127 – 6,055	108,825

* As at the LPD.

4. INFORMATION ON OUR GROUP (Cont'd)

The development cost of the Penang Times Square - Phase 1 project was approximately RM195.49 million. Our Group completed Phase 1 of Penang Times Square in 2008 and obtained CF in January 2009.

Joint Development

The completed project jointly developed by our Group is as follows:-

(c) Tanjung Park

In 1999, our Group via IASB started to embark on the development of the Tanjung Park joint-venture* project. The property development project comprised of 285 units of condominium and 14 units of townhouses.

Note:-

* Pursuant to the Joint Venture Agreement dated 1 July 1999 between Tanjong Tokong Garden Development Sdn Bhd and IASB for the development of the property for the Tanjung Park, Seri Taman Tanjung and City Mall projects, Tanjong Tokong Garden Development Sdn Bhd is entitled to the following:-

- 30% of the proceeds of the sale of each residential units and 40% of the proceeds of the sale of each commercial units; and
- 30% of the unsold residential units and 40% of the unsold commercial units.

Tanjong Tokong Garden Development Sdn Bhd provided the land for the project whilst our Group was responsible for carrying out the entire property development operations including project planning and management, architectural design, building and construction, and sales and marketing. Upon completion of the development, our Group was responsible for the management of the property.

The following are the different types of Residential Property and built-up area for the Tanjung Park project:-

Type of Development	Units Launched [#]	Units Sold [#]	Gross Area [#] (square feet)	Net Sale Value [#] RM'000
Condominium	285	279		86,595
• Typical Suite	231	231	936 – 1,087	56,297
• Executive Suite	46	43	1,926 – 2,292	26,248
• Penthouse	8	5	3,208 – 4,088	4,050
Townhouse	14	12	4,184 – 8,219	9,275

[#] As at the LPD.

4. INFORMATION ON OUR GROUP (Cont'd)

The Tanjung Park project also included clubhouse facilities such as guest lounge, television lounge, games room, sauna, changing room, gymnasium, swimming pool, wading pool, jacuzzi, barbecue area and children playground.

The Tanjung Park project is located on prime land on the main road to the famous Batu Feringgi resort area. Being near the coastline of Penang Island, it maximises from the sea view which enhances the value of the property.

The development cost of the Tanjung Park project was approximately RM60.33 million. Our Group completed the project and obtained CF in November 2003.

(d) Seri Taman Tanjung

In 1999, our Group via IASB started to embark on the development of Seri Taman Tanjung, a joint-venture* project, comprising low-medium and medium cost apartments.

Note:-

* *The joint venture partner for the Seri Taman Tanjung project is Tanjong Tokong Garden Development Sdn Bhd. Please refer to Section 4.4.3(i)(c) of this Prospectus for the details and basis of the joint venture.*

Seri Taman Tanjung comprises one 16-storey apartments (excluding car parks and facilities) with a total of 228 units of low-medium and medium cost apartments.

The following are the different types of property and built-up area for the Seri Taman Tanjung project:-

Type of Development	Units Developed	Units Sold	Built-up Area (square feet)	Net Sale Value RM'000
Low medium cost apartment	155	155	500	10,413
Medium cost apartment	73	73	700	

The development cost of the Seri Taman Tanjung project was approximately RM8.56 million.

4. INFORMATION ON OUR GROUP (Cont'd)

(e) The View Twin Towers

The View Twin Towers* were conceptualised as a luxury and premium priced condominium targeted at the high-income group market segment. The project comprised of two 30-storey condominium towers (excluding car parks and facilities) with a total of 164 units featuring different designs and layouts jointly developed by IASB and our associated company, IVSB.

Note:-

* Pursuant to the Joint Venture Agreement dated 5 May 2004 between IVSB and IASB for the development of the property for The View Twin Towers and the Zen @ The View projects, IVSB is entitled to the following:-

- 20% of the proceeds of the sale of each residential units; and
- 20% of the unsold residential units.

IVSB provided the land for the project whilst our Group was responsible for carrying out the entire property development operations including project planning and management, architectural design, building and construction, and sales and marketing. Upon completion of the development, our Group was responsible for the management of the property.

The key distinguishing feature of The View Twin Towers is a bridge that connects the 2 towers similar to the iconic Petronas Twin Towers in Kuala Lumpur. As such, The View Twin Towers has become a landmark in Penang.

Some of the additional facilities developed by our Group for The View Twin Towers Condominium Project include:-

- Private jacuzzi;
- Barbecue area;
- Swimming and wading pools;
- Jogging tracks;
- Children playground;
- Entertainment room (karaoke room);
- Sky lounge;
- Badminton court;
- Clubhouse facilities including multipurpose hall, gymnasium, game room, and sauna and changing room; and
- Others including reflexology path and landscaped garden.

4. INFORMATION ON OUR GROUP (Cont'd)

The following are the different types of development for The View Twin Towers project:-

Type of Development	Units Developed*	Units Sold*	Built-up Area* (square feet)	Net Sale Value* RM'000
Typical	152	141	2,068 – 2,088	86,935
Duplex	6	6	3,500 – 3,780	5,719
Penthouse	6	6	5,180 – 5,380	8,160

* As at the LPD.

The development cost of The View Twin Towers project was approximately RM57.78 million. Our Group completed The View Twin Towers in 2006 and obtained CF in 2007.

(ii) On-Going Projects

By Our Subsidiaries

The on-going projects which our subsidiaries are developing are as follows:-

(a) Penang Times Square

One of our Group's current on-going projects is the Penang Times Square project.

(Please refer to Section 4.4.3(i)(b) of this Prospectus for the detail descriptions on Penang Times Square project).

The status of the development/ proposed development of the Penang Times Square project undertaken/ to be undertaken by IGSB is as follows:-

Phase	Name of Development	Type of Property	Targeted Completion Year
Phase 2	Birch Regency	21-storey condominium	2011
		6-storey shopping complex	
Phase 3	-	2 blocks of 20-storey condominium	2014
		11-storey shopping complex including exhibition and convention centre	
Phase 4	-	16-storey hotel (with 352 rooms)	2015
		5-storey hotel podium with commercial space	
		6-storey commercial building	

4. INFORMATION ON OUR GROUP (Cont'd)

The Penang Times Square - Phase 2 project comprising commercial and residential units were launched in October 2005 and September 2006 respectively. The following are the details of some of the types of development for the Penang Times Square - Phase 2 which has been launched:-

Type of Development	Units Launched*	Units Sold*	Built-up Area* (square feet)	Net Sale Value* (RM'000)
Birch Regency				
Condominium	359	342		111,057
• Typical unit	340	323	950 – 1,180	99,056
• Duplex	1	1	1,900	726
• Penthouse	18	18	1,747 – 2,248	11,275
Shopping complex				
• Retail lots	159	89	365 – 11,700	56,308

* As at the LPD.

(b) Moonlight Bay

Moonlight Bay* is an on-going property development project undertaken by IMSB. It is a low density development comprising 70 units of individually designed villas and 20 units of low-rise condominiums (condo-villas).

Note:-

* Pursuant to the Agreement dated 18 August 2001 between Lim Soon Hin and Lim Soon Vin as Vendors, IMSB as Purchaser and Dato' Low Eng Hock as the sureties to develop the property. In the event that IMSB serve a notice in writing to the Vendors within a period of 15 months from the date of the agreement, an additional RM1,000,000 is payable to the Vendors ("**Notice**"). The Vendors are entitled to the following:-

- (aa) - 20% of the proceeds of sale of the units in the development;
- 20% of the club house and the open pavilion; and
- 20% of value/ proceeds of sale of any other properties and/or facilities erected or to be erected;

or

- (bb) subject to a total minimum sum of RM18,000,000.

IMSB shall carry out the construction required in connection with and development of the project.

4. INFORMATION ON OUR GROUP (Cont'd)

Each villa is designed to make use of the natural beauty of the sun and sea, and is located on a lush tropical hill in Batu Feringgi. The development provides living on a hillside in harmony with the natural environment. The road entrances are paved with tiles, indicating the elegance and luxury of the project. In addition, our Group also has plans to incorporate a swimming pool and jacuzzi for the villa units. It is targeted at the high-income group segment.

Condominium (Condo-Villas)

The condominiums in the development will comprise two (2) blocks of 5-storey of a total of 20 luxury units, which are offered as an alternative to the villas. The units are designed with a large floor area.

A clubhouse will be provided housing comprehensive amenities such as swimming pool of lagoon features, health facilities, green space and community halls. This luxurious area will serve as the venue for the residents to interact and enjoy the ambience.

Its hilltop gardens will be well-equipped with facilities such as a nature path, tree houses, canopy walks and acts as a retreat for residents. Nature lovers will enjoy the hill features within their neighbourhood.

Tower links will connect the clubhouse and the hilltop garden. A series of linked elevators will provide the residents with easy connection between the two (2) facilities.

The Moonlight Bay project was launched in August 2007. The following are the different types of development for the Moonlight Bay project:-

Type of Development	Units Launched*	Units Sold*	Built-up Area* (square feet)	Net Sale Value* RM'000
Villas	70	52	3,800 – 6,000	118,378
Condominium (Condo-villas)	20	4	1,950– 2,200	4,357

* As at the LPD.

The Moonlight Bay project is targeted to be completed by end of 2010.

4. INFORMATION ON OUR GROUP (Cont'd)

(c) Aston Villa – Phase 2 and Phase 4

The Aston Villa* development project undertaken by IASB is located on an approximately 16 acres plot of land in the prime area within the township of Bukit Mertajam on the mainland of Penang. The township serves as the district Government and commercial activities centre in the area. The project is also located within a 15 minutes drive from the Penang Bridge, a 15 minutes drive from the Ferry Terminal and a 30 minutes drive from Georgetown, Penang. Modern day amenities such as shopping complexes, hotels, transportation terminals, post offices, petrol stations and schools are within 10 minutes walking distance of the development.

Note:-

- * Pursuant to an Agreement dated 8 June 2006 between Arah Pelangi Sdn Bhd as the developer, IASB as the turnkey builder to carry out and complete the development of the property and ISSB to purchase the land at Lot No. 721, Section 4, District of Seberang Perai Tengah, Town of Bukit Mertajam for the construction of an access road (as referred in Section 8.1.2 (iii)(1) of this Prospectus), Arah Pelangi Sdn Bhd is entitled to a minimum sum of RM12,000,000 or allocation of such number of buildings which units are to be selected through a process of balloting equivalent to 26.5% of GDV of the buildings, whichever is higher.

Arah Pelangi Sdn Bhd provided the land for the project whilst our Group is responsible for carrying out the entire property development operations including project planning and management, architectural design, building and construction, and sales and marketing.

The Aston Villa development aims to provide a serene, low density and high-end residential community, which is supported by commercial units and retail outlets.

The Phase 2 and Phase 4 of the Aston Villa project comprise 12 units of 4-storey shop office blocks and approximately 88 units of 3-storey terrace houses, semi-detached houses and bungalow.

The terrace houses are priced at approximately between RM140 to RM180 per square foot whilst semi-detached houses and bungalows at approximately between RM150 to RM200 per square foot. On average, prices for 4-storey shop offices are priced at approximately between RM195 to RM230 per square foot.

4. INFORMATION ON OUR GROUP (Cont'd)

The following are the different types of property and built-up areas for the Aston Villa - Phase 2 and Phase 4 project:-

Type of Development	Units Launched ⁽ⁱ⁾⁽ⁱⁱ⁾	Units Sold ⁽ⁱⁱ⁾	Built-up Area ⁽ⁱⁱ⁾ (square feet)	Net Sale Value ⁽ⁱⁱ⁾ RM'000
4-storey shop lots	8	1	4,580 – 4,700	935
Landed terrace and semi-detached houses	65	34	2,850 – 3,750	17,491

(i) Exclude landowner's units of 4 shop lots and 23 landed terrace and semi-detached houses equivalent to approximately 26.5% of GDV of the Aston Villa - Phase 2 and Phase 4 project.

(ii) As at the LPD.

The Aston Villa – Phase 2 and Phase 4 project is targeted to be completed by 2012.

By Our Associated Companies

(d) **Zen @ The View**

Part of our Group's on-going property development project, Zen @ The View* is an individualised bungalow development jointly undertaken by IASB and our associated company, IVSB. This is an innovative approach in property development where our Group, with its experienced and innovative design team, would work with the customer to conceptualise, design and then build the home to create a truly individualised home that fits the exact requirement of the customer.

Note:-

* The joint venture partner for the Zen @ The View project is IVSB. Please refer to Section 4.4.3(i)(e) of this Prospectus for the details and basis of joint venture.

With the individualisation approach to property development, Zen @ The View targets the exclusive segment of the market. Our Group aims to develop only seven (7) units of individualised bungalows on approximately one (1) acre land located in Batu Uban, Penang Island. The built-up area for each unit ranges from approximately 3,700 to 4,700 square feet.

4. INFORMATION ON OUR GROUP (Cont'd)

The following is the type of development for the Zen @ The View project:-

Type of Development	Units Launched*	Unit Sold*	Built-up Area* (square feet)	Net Sale Value* RM'000
Bungalow	7	1	3,700 – 4,700	3,000

* As at the LPD.

(e) Island Resort – Phase 1 to Phase 3

The Island Resort* development project jointly undertaken by IASB and our associated company, ICSB, is located on a 20 acres plot of land in the vicinity of the Penang's holiday resort area in Batu Feringgi. The Island Resort is ideally located within a 10 minutes drive from Tanjung Tokong towards the east and Teluk Bahang in the west of the island. The development is only a 25 minutes drive from the city of Georgetown and 5 minutes drive from Batu Feringgi, a famous tourist and resort hotspot containing comprehensive amenities such as retail outlets, post office, banks, clinics, hotels and resort homes. It is accessible from Jalan Batu Feringgi, the main access road that leads to the famous tourism hotspots with the beach within walking distance. The Island Resort is idyllically located on a scenic hill overlooking a sandy bay with appealing sea views.

Note:-

* Pursuant to the Joint Venture Agreement dated 30 September 2004 between Alam Harmoni Sdn Bhd as the landowner, ICSB as the developer and Dato' Low Eng Hock, Dato' Mohamad Subky Bin Haji Abdul Raof and Azri Bin Mohamed Aziz as the former shareholders of ICSB; Supplemental Agreement dated 18 August 2009; Supplemental Letters dated 12 October 2009 and 28 December 2009 between Alam Harmoni Sdn Bhd, ICSB, Dato' Low Eng Hock and Azri Bin Mohamed Aziz, IASB and ISSB; and Supplemental Letter dated 25 February 2010 between Alam Harmoni Sdn Bhd, ICSB, Dato' Low Eng Hock and Azri Bin Mohamed Aziz, IASB, ISSB and our Company for the development of the property for the Island Resort project, Alam Harmoni Sdn Bhd is entitled to a minimum sum of RM47,700,000 or entitled to such number of buildings which units are to be selected through a process of balloting equivalent to 26.5% of the GDV of the buildings, whichever is higher.

Alam Harmoni Sdn Bhd provided the land for the project whilst our Group is responsible for carrying out the entire property development operations including project planning and management, architectural design, building and construction, and sales and marketing. Upon completion of the development, our Group will be responsible for the management of the property.

4. INFORMATION ON OUR GROUP (Cont'd)

The overall Island Resort development site is set on rolling terrain, which allows the development area to maximize the natural beauty of seafront enclave. The development project will comprise low density landed and high-rise residential developments supported by quality amenities featured in an exclusive clubhouse.

The Island Resort development will comprise approximately 455 units of condominiums and bungalows as well as uniquely designed townhouses. The project's exclusive clubhouse will be equipped with sports and recreational facilities.

The Island Resort development targets investors that like to enjoy the serenity of the beach and seaside. The various types of exclusive dwellings are suitable for foreigners who like to have second homes in Penang. The estimated GDV of the Island Resort development project is RM380.2 million.

The Island Resort is segregated into four (4) phases as follows:-

Phase	Type of Property
Phase 1	Club House
Phase 2	33-storey Condominium ⁽ⁱ⁾
	Townhouse
Phase 3	Bungalow
Phase 4	35-storey Condominium ⁽ⁱ⁾⁽ⁱⁱ⁾

(i) Excluding car parks and facilities; and

(ii) Future project and subject to approval being obtained from the authorities.

The following are the different types of development for the Island Resort project for Phase 1, Phase 2 and Phase 3:-

Type of Development	Units Launched ⁽ⁱ⁾⁽ⁱⁱ⁾	Units Sold ⁽ⁱⁱ⁾	Built-up Area ⁽ⁱⁱ⁾ (square feet)	Net Sale Value ⁽ⁱⁱ⁾ RM'000
Phase 2 - 33-storey Condominium ⁽ⁱⁱⁱ⁾	199	168	1,100 – 3,200	84,705
Phase 2 - Townhouse	11	-	3,850	-
Phase 3 - Bungalow	16	-	3,500 – 6,000	-

(i) Exclude landowner's units of 67 condominiums, 4 townhouses and 5 bungalows equivalent to approximately 26.5% of GDV of the Island Resort - Phase 2 and Phase 3 project;

(ii) As at the LPD; and

(iii) Excluding car parks and facilities.

The Island Resort development project has commenced development in 2009 and is expected to be completed by 2012.

4. INFORMATION ON OUR GROUP (Cont'd)

(iii) Future Projects**By Our Subsidiaries**

The future projects which will be developed by our subsidiaries are as follows:-

(a) Aston Villa – Phase 1 and Phase 3

The Phase 1 and Phase 3 of the Aston Villa development to be undertaken by IASB will comprise a 4-storey shop office lots and a commercial shopping mall with retail outlets which are architectural designed to appeal to the community and to provide daily needs of local residents, as well as being a major shopping destination.

Together with the Phase 2 and Phase 4 of the Aston Villa development, the project targets investors from other states in Malaysia as well as local residents and buyers that like to enjoy both conveniences in urban living in a serene environment. The overall estimated GDV of the Aston Villa development project is RM110.0 million.

The Aston Villa Phase 1 and Phase 3 development project is expected to commence development in 2012. Its completion date is expected to be in 2015.

(b) City Mall

The City Mall* development project to be undertaken by IASB is located on a 2.4 acres plot of land in the centre of the township of Tanjung Tokong in the Penang Island. The development is accessible from the main road, Jalan Tanjung Tokong, one of the most important primary accesses of the township. It is also ideally located within a 10 minutes drive from Teluk Bahang in the west of the island. The development is only a 15 minutes drive from the city of Georgetown.

Note:-

* *The joint venture partner for the City Mall project is Tanjung Tokong Garden Development Sdn Bhd. Please refer to Section 4.4.3(i)(c) of this Prospectus for the details and basis of the joint venture.*

The mall is expected to provide amenities such as shopping arcades, dining and retail outlets, food and beverage facilities.

4. INFORMATION ON OUR GROUP (Cont'd)

The City Mall development site will comprise condominiums on top of a shopping mall containing retail outlets. The site will have approximately 315,000 square feet of shopping area which is enhanced with a tropical style interior design with landscape elements such as giant palm trees and water features that are set in an open design.

On average, condominiums are priced at approximately RM480 per square foot and commercial properties will be priced at an average of RM700 per square foot. The City Mall development targets the upper income local buyers and overseas investors with its high-end condominiums surrounded by various types of facilities. The estimated GDV of the City Mall development project is RM269.6 million.

The City Mall project is expected to commence development in 2011. Its completion date is expected to be in 2014.

Our Group has obtained the planning approval from MPPP in October 2009 for the City Mall development and is in the midst of preparing new plans for submission to MPPP. Please refer to Section 3.1(ix) for further details of the regulatory requirements governing the planning and building plans approvals.

(c) Ivory Eco Park @ Tanjung Malim

The development project, called Ivory Eco Park @ Tanjung Malim to be undertaken by IASB is located on a 498 acres plot of land in Behrang, in the district of Tanjung Malim, Perak. It is located 3 kilometres from Behrang Toll on the North-South Highway, a 45 minutes drive from the Klang Valley. It is 5 minutes drive from Proton City and less than 5 kilometres drive from both Bandar Behrang 2020 and the township of Tanjung Malim.

The Ivory Eco Park @ Tanjung Malim is set on a strategic location surrounded by several major cities and landmarks and is less than 5 minutes drive from the future double track railway station with direct access from a new 30 metres wide district highway.

The Ivory Eco Park @ Tanjung Malim development project has more than 1.5 kilometres of commercial frontage on both sides of the new highway. It is located on a natural gentle terrain, which provides quality residential living with appealing views.

4. INFORMATION ON OUR GROUP (Cont'd)

The Ivory Eco Park @ Tanjung Malim is a mixed development project comprising residential, commercial and leisure developments. It is designed to address growth opportunities from the area, which to-date comprises Automobile Industry (Proton City) and Education Hub. As a mixed development set away from the main city, it is also able to provide a tranquil township for people who want to get away from a busy urban lifestyle. The development plan will feature green pockets and water features located at every corner of the new town to ensure a natural quality living environment.

The estimated GDV of the Ivory Eco Park @ Tanjung Malim development project is RM420 million.

The Ivory Eco Park @ Tanjung Malim development project is expected to commence its development in 2013. Its completion date is expected to be in 2018.

Our Group has obtained the planning approval for Phase 1 of the Ivory Eco Park @ Tanjung Malim development project in 2008. Please refer to Section 3.1(ix) for further details of the regulatory requirements governing the planning and building plans approvals.

By Our Associated Companies

The future projects which will be developed by our associated companies are as follows:-

(d) Mount Erskine Development

The Mount Erskine Development* to be jointly developed by IASB and our associated company, IVSB, is located on a 24 acres plot of land in Tanjung Tokong, a prestigious and popular residential area comprising a natural environment and appealing sea views. The development project is approximately 10 minutes drive from Georgetown, Penang. It is also within walking distance from the township of Tanjung Tokong, where there are comprehensive amenities including shopping complexes, retail shops, supermarkets, eating facilities and food courts. The development resides on a higher terrain above sea level, on a gentle slope.

Note:-

* Pursuant to the:-

(aa) *Rehabilitation Agreement dated 12 April 2007 between Gewaris Sdn Bhd (in liquidation) as the land owner and IVSB as the developer to complete the housing development; and*

4. INFORMATION ON OUR GROUP (Cont'd)

(bb) *Redemption cum Settlement Agreement dated 12 April 2007 between Malaysia Building Society Berhad ("MBSB"), IVSB and Gewaris Sdn Bhd (in liquidation) as the chargor/ borrower in relation to the settlement and redemption arrangement to redeem the land from MBSB. MBSB has on 2 November 2009 granted bridging loan facilities to IVSB as the borrower to complete the housing development.*

In accordance to the abovementioned agreements:-

- *Principal sum of RM53,000,000 shall be payable via redemption of the individual unit of properties to be erected on the land; and*
- *Interest chargeable on aggregate of principal and interests outstanding at 1% above MBSB's effective cost of fund per annum with monthly rest on a daily basis.*

IVSB will be responsible for carrying out the entire property development operations including project planning and management, architectural design, building and construction, and sales and marketing. Upon completion of the development, our Group will be responsible for the management of the property.

The Mount Erskine development will consist of spacious apartments with affordable pricing, as well as having the appealing views and amenities of a luxury condominium. The project will comprise six (6) blocks of condominiums and apartments with built-up areas ranging from approximately 650 square feet to 4,000 square feet. Retail shops will be located at ground level comprising supermarkets or mini markets, and food and beverages outlets.

Residential condominiums and apartments will be priced from approximately RM250 to RM520 per square foot for residential condominium and at RM110 per square foot for apartments. As for retail shop lots, the price will be from RM400 to RM450 per square foot. This property development targets local buyers that enjoy peaceful suburban lifestyles with highly accessible amenities. The estimated GDV of the Mount Erskine development project is approximately RM416.5 million.

The Mount Erskine development is segregated into two (2) phases:-

Phase	Property Name	Type of property
Phase 1	The Peak Residences	Condominium and commercial shops
	Taman Bukit Erskine	Apartment
Phase 2	The Latitude	Condominium and commercial shops

4. INFORMATION ON OUR GROUP (Cont'd)

The first phase of the Mount Erskine Development, named The Peak Residences, offers a lifestyle with various amenities, amazing views and high rise living. The residential suites are high end condominiums located in the Tanjung Tokong area. Its exclusive features include a private garden that is designed into each and every garden, executive and penthouse suite. The suites also possess a very spacious layout with multiple scenic views as well as offering elegant entry galleries and a well planned transition between social and private areas. All residential suites feature a graceful combination of striking architecture, impeccable hospitality and sustainable design. Apart from the residential suites, a range of facilities and services are available at its commercial area located on the lower floor of the building.

The Mount Erskine development project is estimated to commence its development in 2010 and is targeted to be completed by 2015.

Our Group has obtained the planning and building plans approval from the authority, and is in the midst of preparing new plans for submission to MPPP in respect of the project. Please refer to Section 3.1(ix) for further details of the regulatory requirements governing the planning and building plans approvals.

(e) Island Resort - Phase 4

The Island Resort* development project for Phase 4 to be jointly undertaken by IASB and our associated company, ICSB, is one of the future projects. This is mainly for the proposed development of two (2) blocks of 35-storey of condominiums.

Note:-

* *The joint venture partner for the Island Resort - Phase 4 project is Alam Harmoni Sdn Bhd. Please refer to Section 4.4.3(ii)(e) of this Prospectus for the details and basis of joint venture.*

The Island Resort development project for Phase 4 is expected to commence by 2013.

(Please refer to Section 4.4.3(ii)(e) of this Prospectus for the detail descriptions on Island Resort project).

Our Group has obtained relevant development approvals for Phase 1, Phase 2 and Phase 3. Please refer to Section 3.1(ix) for further details of the regulatory requirements governing the planning and building plans approvals.

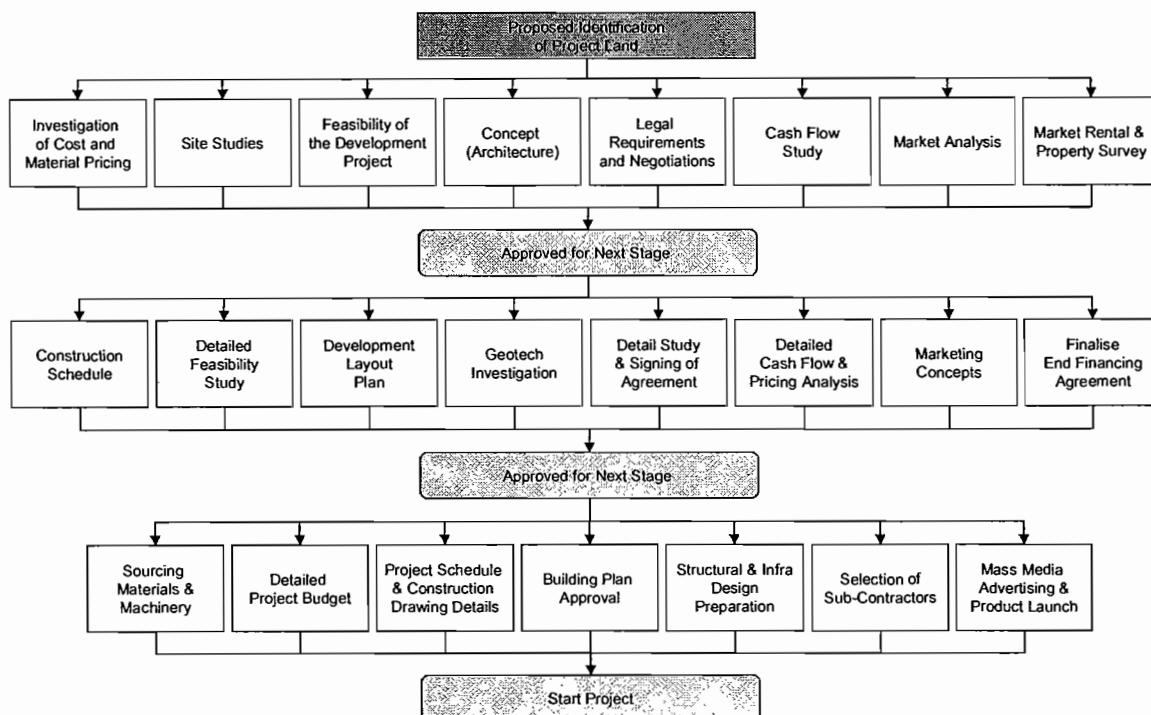
4. INFORMATION ON OUR GROUP (Cont'd)

4.4.4 Operating or Trading Mechanism

The main process flow of a property development project is as follows:-

- (i) Identification of project land;
- (ii) Preliminary feasibility studies and design concepts;
- (iii) Submission of plans for approval and applications for permits and licences;
- (iv) Marketing and sales;
- (v) Undertake building and construction work; and
- (vi) Completion of project.

Stage 1 of the property development process is as follows:-



The process starts with the identification of the project land from various government departments and other sources.

Preliminary feasibility studies are carried out on the proposed project land. These include the preliminary investigation on building material costs and pricing. A preliminary study on the project site is also undertaken to evaluate the suitability of the location of the development.

The feasibility of the development project is also looked into at this stage of the assessment of the proposed project. The preliminary concept of the development involving the architect and other consultants is undertaken for the proposed project.

Our Group's representing lawyers undertake all legal requirements for the purchase of the proposed land including negotiations. Our Group's Accounts and Finance Department generate a cash flow study of the proposed project and market analysis, and a survey of the market rental and property is carried out prior to the approval for the purchase of the project land.

4. INFORMATION ON OUR GROUP (Cont'd)

Once the criteria of the preliminary feasibility studies have been met and approved, the project progresses to the next part of the project development process. A construction schedule is worked out for this phase of the development project and our Group's Accounts and Finance Department carries out a more detailed feasibility study of the proposed development.

The surveyor, engineer and town planner will draw up the project development plan and layout, and a geotechnical investigation of the proposed development land and surrounding areas is also carried out. The layout plans are then submitted to the appropriate authorities for processing and approval.

A final detailed study of the land purchase agreement is undertaken before the purchasing contract or agreement is signed. A detailed cash flow and pricing analysis of the proposed development project is also completed.

Proposed marketing concepts of the development project are then subjected to discussion before its marketing and advertising plans are finalised. End financing agreements are finalised with the financial institutions before the agreements and contracts are signed.

Applications are then made for the transfer of the land title(s) and payment of stamp duty after the purchase of the project land. Upon the transfer of ownership and land titles of the project land to its new owners and the receipt and compilation of the construction drawings and project schedule, the management begins the sourcing and the negotiation of prices of building materials and machinery.

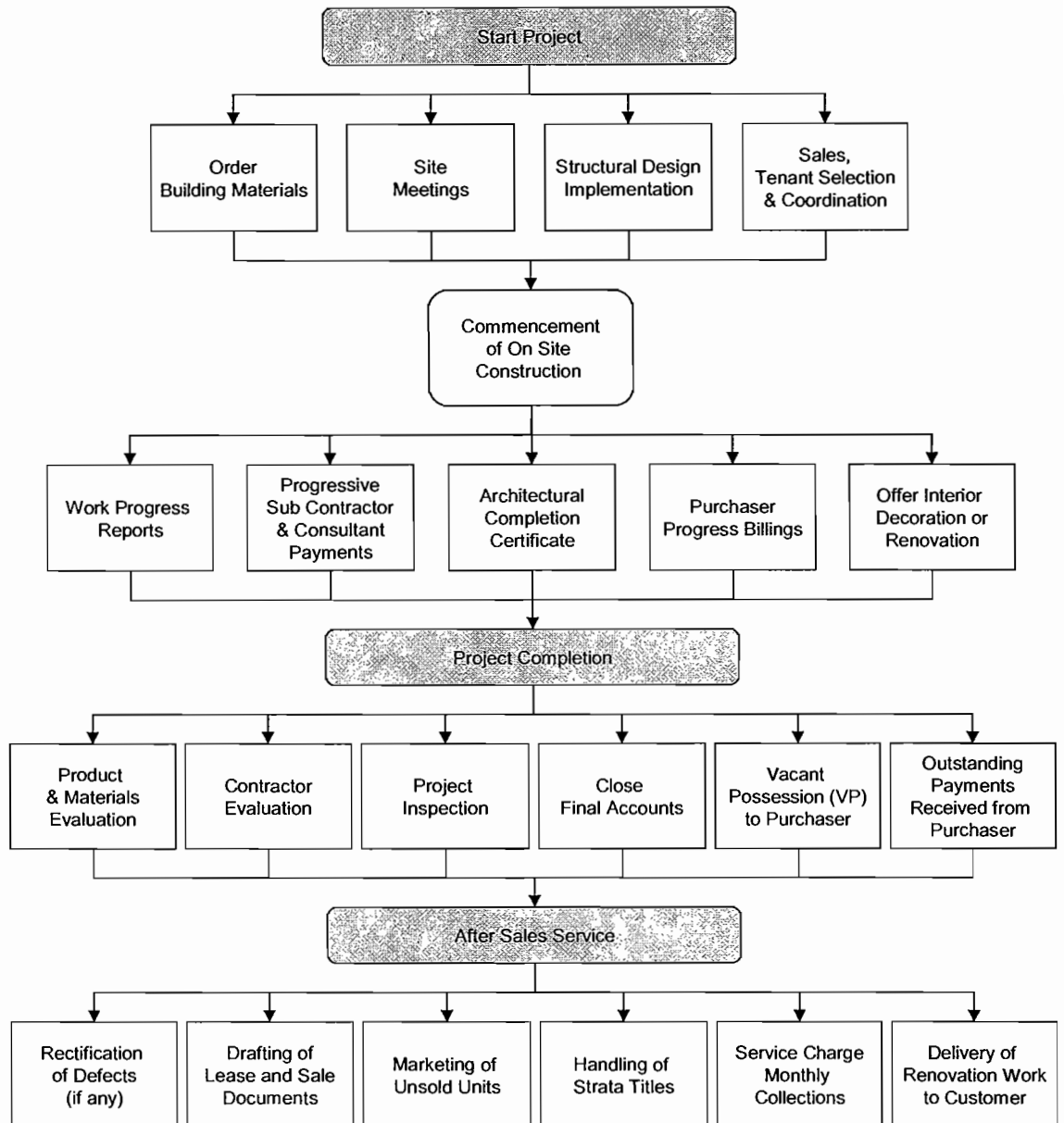
At this stage of the development project, the Accounts and Finance Department prepare a detailed project budget and details of the project schedule, and construction drawings are issued.

The relevant Government departments such as Jabatan Perancang Bandar, Majlis Daerah and Pejabat Tanah approve the project building and layout plans, and the design of structural and infrastructure of the development project is prepared. Sub-contractors for the development project are also selected at this stage of the development process. Simultaneously, the management launches the development project through mass media advertising to the general public.

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4. INFORMATION ON OUR GROUP (Cont'd)

Stage 2 of the property development process is as follows:-



Upon the resumption of the development project, our management proceeds to order the building materials from our selected suppliers. Site meetings are conducted on a regular basis before construction commences. Our management also prepares for implementation of the property structural design.

Product sales of the development are conducted before the commencement of construction, including the selection of tenants and property management coordination. Upon the commencement of construction, work progress reports are issued to the management on a regular basis.

During progress of construction of the project, progressive payments are made to the sub-contractors and consultants involved in the development project. The architect issues project completion certificates upon the completion of construction within the development project.

4. INFORMATION ON OUR GROUP (Cont'd)

The Marketing Department will also issue progress billings to purchasers for payment as the construction of the development property is in progress. Renovation and other interior design work are offered to the purchaser at this stage of the development process.

When the development project is completed, the Procurement Department evaluates the products and materials procured for the construction of the development. The management will also undertake an evaluation of the contractors and sub-contractors as well as a full inspection of the completed development project.

The Accounts and Finance Department will finalise and close all accounts related to the development project. The Marketing Department will inform purchasers to receive vacant possession of the property, issue related bills related to property titles and amenities, and ensure receipt of all outstanding payments due before the release of the property keys to the purchasers.

The new owners and the property management will undertake a joint inspection of the completed property to ensure that there are no defects. After sales service provided by our Group to the purchaser includes rectification of defects, drafting of leasing and sales documents, coordinating with banks on financing and registration of strata titles.

As part of the after sales services, the Property Management Department provides monthly collection of the service charge and attending to the owners' or residents' enquiries. Our management and Marketing Department will also conduct the marketing of any unsold development units.

Any renovation or interior decoration work done on the building is completed and delivered to the purchaser at this stage, including handling rectification of interior design work.

4.4.5 Technology Used

We are an integrated property developer incorporating in-house architecture and engineering design, building and construction, interior design and fit-out, and property management. As such, technologies that are relevant to our Group include the following:-

(a) Structural Engineering

Structural engineering is concerned with designing of complex structure system, which utilises the application of mechanics to the design of structure elements and systems, such as buildings, bridges, walls, dams and tunnels.

The application of structural engineering is to ensure achievability of a given design intent such as the following:-

- Safety, such as structures do not collapse without due warning; and
- Serviceability, such as floor vibration and building sways are not uncomfortable to occupants.

Structural engineering also incorporates the following:-

- Design of beams, columns and floor incorporating calculation of loads on each of them and the load capacity of building materials such as steel, masonry, concrete and others; and
- Physics of moisture, heat and energy inside the building.

4. INFORMATION ON OUR GROUP (Cont'd)

In some cases, the focus of structural engineering can be further segmented into the following:-

- Bridge engineering;
- Structural engineering for buildings;
- Pipeline engineering; and
- Industrial structures.

Our Group primarily utilises structure engineering technologies for buildings, which is focused on structural loads. Structural loads can be further classified into the following:-

- Live loads such as weight of occupants and furniture in a building, forces of wind or weight of water, forces due to seismic activity such as earthquakes and tremors;
- Dead loads including the weight of the structure itself and major architectural components; and
- Live roof loads such as material and manpower loading the structure during construction.

(b) Construction Engineering

Typically, construction engineering involves planning and management of the construction of structures such as buildings, highway, bridges, airport and other structures. Construction of such projects requires knowledge of engineering and management principles, and business procedures, economic and human behaviour. The planning and management functions include execution of the designs from transportation, site development, hydraulic, environmental, structural and geotechnical functions.

In general, there are three (3) types of constructions:-

- Building;
- Highway; and
- Industrial.

Our Group primarily focuses on building construction and utilises the aluminium (as opposed to plywood) formwork system as a type of construction technique to build tall buildings such as condominium.

(c) Geotechnical Engineering

Geotechnical engineering uses the principles of mechanics to analyse the behaviour and performance of earth materials such as soils and rocks.

In general, geotechnical engineering involves design of building foundations, retaining systems, dikes and dams, and large cuts and embankments.

4. INFORMATION ON OUR GROUP (Cont'd)

Some of the activities commonly undertaken within geotechnical engineering include:-

(a) Ground improvement

Ground improvement is to improve or modify poor soil conditions to meet foundation requirements for specific construction of buildings or infrastructures.

(b) Stability of slopes

The purpose of slope stability is prevention of slope failure, which is downward and/or outward movement of slope-forming materials (such as natural rock, soils, artificial fills or combination of these materials).

(c) Pile foundation

Pile foundation commonly refers to piles with structural members of small cross-sectional area compared to their length and is usually installed by various methods (including driving, vibrating or drop hammers). Pile foundations are used where loads must be transferred to more suitable material at a greater depth.

Foundation designs are critical for construction of building as it is to improve the bearing pressure rather than attempting to bypass the weaker soils with piled foundations.

(iv) **Quantity Surveying**

Quantity surveying is commonly involved in formulation and evaluation of proposed construction cost and budget, and managing the financial part of constructing a building or complex engineering installation from design stage to final completion of project.

Our Group currently applied the following for its quantity surveying:-

- Prepare bills of quantities;
- Prepare cost plan;
- Calculate unit rates and prepare estimate costs or budget;
- Interpret and study construction contracts; and
- Prepare valuation and cost reports after the post contract stage.

(v) **Architecture**

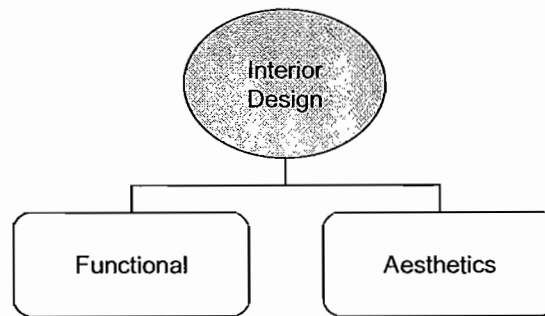
Architecture commonly refers to a style or method of designs and construction of buildings to furnish practical use with aesthetic solutions. Architecture emphasises on appropriateness, uniqueness and innovative designs to meet functional requirements, as well as sense of a place within its surrounding in physical and social context.

4. INFORMATION ON OUR GROUP (Cont'd)

(vi) Interior Design

Interior design usually refers to the techniques, skills and expertise involved in developing creative and technical solutions applied within a structure or building to achieve a desirable and appealing interior environment.

Interior design focuses on two (2) areas as follows:-



Functionality of interior design refers to creation of various space and solutions to meet the required functions such as work area, study area, recreation area in living room, storage and work area for kitchen and others.

The aesthetics commonly refers to innovative designs and finishing that generate visual appeal.

Some of the interior design services carried out by our Group include the following:-

- (a) Research and analysis of the overall concept and requirements, and development of drawings and diagrams that outline the needs;
- (b) Formulation of preliminary space plans with two and three dimensional design concept, studies and sketches that integrate all the needs based on knowledge of the principles of interior design;
- (c) Confirmation that the preliminary space plans and design concepts are safe, functional and aesthetically appropriate;
- (d) Selection of colours, materials and finishing to suitably convey the design concept and to meet functional, life-cycle and safety requirements;
- (e) Selection or specification of furniture, fixtures, fittings, equipment and millwork, including layout drawings and detail product descriptions, and provision of documentation to facilitate pricing, procurement and installation of furniture; and
- (f) Coordination and collaboration with other professionals and technical personnel such as architects and structural, mechanical and electrical engineers.

4. INFORMATION ON OUR GROUP (Cont'd)

4.5 COMPETITIVE ADVANTAGES

Our Group has distinct advantages over its competitors in the following areas:-

(i) Established Track Record and Market Reputation

Our Group has been in business for eleven (11) years since 1999. Throughout our years of operation, we have developed a strong market reputation for reliability and quality in the state of Penang.

Our Group's established track record is demonstrated by the following completed and on-going property development projects in Penang:-

- (a) Approximately 96% of our Group's total completed residential and commercial units have been successfully sold, which is the best indication of the confidence of investors and home owners.
- (b) Our Group has successfully completed the development projects of medium to high-end residential and commercial property developments as reflected in the Tanjung Park, Plaza Ivory, Palace Hill, The View Twin Towers and Penang Times Square - Phase 1 projects.

(ii) In-house Architecture and Design Facilities

We have our own in-house dedicated team of architects and design consultants that are focused on conceptualising the design and planning of the entire property development. This ensures that our Group is not dependent on external architects and consultants.

In addition, having an in-house architecture and design team enable our Group to develop and have ownership of proprietary designs which also constitutes as a major selling point or area of differentiation from competitors.

This is reflected in the design and planning of all of our developments such as Moonlight Bay, a gated residential development situated on the famous Batu Feringgi resort district, which is focused on retaining the use of natural characteristics of the surrounding environment unique to the respective sites. Other designs such as the Penang Times Square is modelled after town squares in Europe.

Our Group's architecture and design of Penang Times Square was also featured in the China Architecture Magazine in 2005.

(iii) Integrated Property Developer

Our Group is an integrated property developer with the full in-house facilities and expertise to undertake the following:-

- (a) Development planning;
- (b) Architecture and engineering design;
- (c) Building and construction;
- (d) Interior design and fit-out; and
- (e) Property management.

4. INFORMATION ON OUR GROUP (Cont'd)

The integrated range of in-house facilities and expertise enables our Group to control and monitor the quality of the entire development from conceptualisation and planning, architecture and engineering, completion of construction through to property management. In addition, our Group is also able to increase our profit margin as key functions are undertaken in-house and not outsourced to third parties.

(iv) Strategic Locations of Developments

All of our Group's property development in Penang are strategically located. Our Group's developments are in prime locations in Penang, which is a major competitive advantage as this is critical in facilitating a high and fast take-up of properties.

Our Group's completed and on-going developments are located in the following:-

(a) Tanjung Park

Tanjung Park is a residential high-rise condominium and townhouse development completed in 2003 with estimated GDV of RM104.4 million. The project comprises 285 units in two 22-storey condominiums (excluding car parks and facilities) with two rows of townhouses strategically located in Tanjung Tokong, Penang.

(b) Plaza Ivory and Palace Hill

Plaza Ivory and Palace Hill is a mixed commercial and residential development on a land area of approximately 9.2 acres with estimated GDV of RM125.7 million. The development is located in Bukit Gambier, Penang.

Palace Hill features 40 units of landed properties comprising bungalows and semi-detached houses whilst Plaza Ivory is a mixed development of approximately 65,000 square feet commercial retail space and 272 units of residential high-rise condominiums.

(c) The View Twin Towers

The View Twin Towers is a residential high-rise condominium development located in Batu Uban, Penang which is strategically located between Georgetown and the high-tech manufacturing hub of Bayan Baru Free Trade Zone with estimated GDV of RM109.3 million. The development is located opposite the Universiti Sains Malaysia campus.

The project comprised 164 units in two 30-storey condominiums (excluding car parks and facilities). All units command a view of the Penang Straits and the bridge. The development was completed with CF obtained in 2007.

4. INFORMATION ON OUR GROUP (Cont'd)

(d) Penang Times Square

Penang Times Square is a large mixed development project comprising high-rise condominiums, shopping complex and a 352-room hotel with estimated GDV of RM1,258.1 million. The development is located in the heart of the city at Jalan Dato Keramat, Penang.

The development comprises mainly of high-rise condominiums and shopping complexes in Phase 1 and Phase 2 whilst super condominium, shopping complex with convention centre and cineplex, and a hotel with commercial spaces are in Phase 3 and Phase 4 of the Penang Times Square development.

(e) Moonlight Bay

Moonlight Bay is a mixed of residential development project comprising 70 units of villas and 20 units of condominium (condo-villas) with estimated GDV of RM190.0 million. The development is located in Batu Feringgi, Penang Island.

(f) Zen @ The View

Zen @ The View is a bungalow development located in Batu Uban, Penang with estimated GDV of RM15.3 million. Zen @ The View is a customised bungalow development, whereby each bungalow is customised to meet the requirements of the owner in terms of the design.

(g) Island Resort

The Island Resort development project is located on a 20 acres plot of land in the vicinity of the Penang's holiday resort area in Batu Feringgi.

The development will comprise approximately 455 units of condominiums, bungalows, townhouses as well as an exclusive clubhouse which will be equipped with sports and recreational facilities.

The estimated GDV of the Island Resort development project is RM380.2 million.

(v) Standards of Quality

Our Group has continuously placed emphasis on maintaining high standards of quality in our developments and this is reflected by our quality management systems that are in place namely ISO 9001:2008 certification for IASB, G&A and IPMSB.

These certifications provide customers with the assurance that our Group adheres strictly to certain quality processes.

4. INFORMATION ON OUR GROUP (Cont'd)

(vi) Faster To Market

Our Group is able to complete the whole development cycle in a relatively shorter timeframe as it is an integrated developer where all the core functions are undertaken in-house. As such, with better project control and coordination of the development cycle with minimum dependency on third parties, we are able to bring properties faster to market.

(vii) Price Appreciation of Our Group's Properties

The appeal of the projects developed by our Group is further enhanced by the general increase in the price of the property developed by our Group. Thus, this provides capital gains to purchasers which are substantiated by the following:-

	Average Annual Growth Rate (%) [*]
Tanjung Park (2000 – 2009)	
Condominium – typical suites	8.20
Condominium – executive suites	2.74
Townhouse	2.80
Plaza Ivory (2001 – 2009)	
Condominium	7.41
Shop office/ house	6.85
Retail Shop	11.25
Palace Hill	
Landed Houses	1.08
The View Twin Towers (2003 - 2009)	
Condominium	8.31
Penang Times Square - Phase 1 (2005 to 2009)	
Condominium	8.81
Shopping Complex	17.11

* Comparing secondary market sale prices and the original sale and purchase agreement price.

As such, the proven track record of increases in capital gains from our Group's properties will fuel the increase in demand for future properties developed by our Group.

4. INFORMATION ON OUR GROUP (Cont'd)

4.6 QUALITY CONTROL PROCEDURES

Our Group has always placed significant emphasis on the quality and adheres to stringent quality standards. This is reflected by the fact that IASB, G&A and IPMSB are ISO 9001:2008 certified companies.

The quality accreditations indicate that our Group adopts certain processes and procedures to ensure that quality standards are maintained internally. This provides customers with the comfort and assurance of the quality of our Group's developments.

Our Group has a team of dedicated and experienced project managers and site supervisors to closely monitor the design and construction of the development.

Over the last eleven (11) years of operations, our Group has built a reputation for the construction of quality residential and commercial developments, which is synonymous with our Group's vision of providing quality developments.

4.7 R&D

As our Group is primarily in property development, R&D activities are different compared to the Manufacturing Industry.

Our Group's R&D activities are focused on continual improving of our developments and processes with the aim of meeting customer needs and minimising costs to ensure sustainable business success.

As such, some of the areas of R&D undertaken by our Group include:-

- (i) Concepts and designs;
- (ii) Product packaging;
- (iii) Process flow;
- (iv) Market and user need studies; and
- (v) Building material sourcing and applications.

As most of the R&D activities are focused on operation processes, the main skills required are formal training and experiences on the following areas or principles:-

- (i) Civil engineering;
- (ii) Structural engineering;
- (iii) Construction engineering;
- (iv) Interior design;
- (v) Architecture; and
- (vi) Other engineering disciplines.

As at the LPD, our Group has a team of 97 technical personnel including technical managers, civil and structural engineers, architects, urban planners, quantity surveyors, interior designers and other technical personnel that has input into the R&D process.

Some of the R&D activities undertaken by our Group in conjunction with our in-house architects, engineers and interior designers include creating winning concepts and designs that are innovative, contemporary and fresh that meet the needs of our target market segments. This is essential to ensure fast take-up, which is key to good cash flow and business success.

4. INFORMATION ON OUR GROUP (Cont'd)

Areas of R&D for concepts and designs include:-

- (a) Selection of local and international best practices in successful and proven concepts that best meet the needs of the target segment;
- (b) Continuous improvement and modification of current and past concepts and designs to develop new and innovative design and products. Some of the areas applicable include:-
 - Theme of development;
 - Design and structure of building;
 - Facade and external cladding and finishing;
 - Functional areas and space utilisation;
 - Internal design and layout;
 - Internal features and options such as size of kitchen, living hall, dining areas, bedrooms and other innovative areas;
 - Fixtures and fittings;
 - Built-up size of overall units;
 - Additional facilities and amenities such as gymnasium, private jacuzzi, swimming pools, playground and others;
 - Energy efficiency;
 - Blending with the environment; and
 - External landscape and ornamental structures.

Our Group constantly obtain feedback to verify the success of concepts and designs as well as for continuous improvement. The results of our Group's R&D work are reflected in the various projects that our Group has successfully launched.

(i) Product Packaging

Areas of R&D for product packaging include:-

- (a) Researching and developing the optimum product package to maximise profitability and fast take-up. Components of product packaging includes, among others:-
 - Pricing;
 - Financing options;
 - Optional items;
 - Optional features; and
 - Different grade of finished materials provided.
- (b) Researching and developing the optimum product package is critical to take into consideration the following:-
 - Types of development (residential or commercial);
 - Needs of various target segment;
 - Types of construction;
 - Economic conditions; and
 - Competitive forces such as choices of alternatives.

4. INFORMATION ON OUR GROUP (Cont'd)

(ii) Process Flow

Our Group is continuously improving our processes as a means of creating and sustaining competitive advantages in the following areas:-

- (a) Enhancing business effectiveness, efficiency and productivity to optimise production and operating costs;
- (b) Continuous improvements in utilising existing and new technologies to develop innovative products; and
- (c) Continually improving service quality to ensure customer satisfaction.

Nevertheless, our Group researches on the suitability of using technologies in building and construction operations to optimise our processes.

Some examples of the improvements in the processes flow could include the following:

- (a) Use of mechanised formwork system in place of traditional formwork system to enhance safety, increase speed of construction and reduce labour force;
- (b) Use of steel sections instead of concrete load bearing structures to reduce labour force and increase speed of construction; and
- (c) Use of more machinery and equipment to replace labour and to quicken the process.

Our Group continuously produces incremental improvements to our engineering knowledge and expertises through continuous practical application of these skills. These improvements are internalised to enable our Group to continuously upgrade our capabilities as well as increase the efficiency of our business processes.

(iii) Building Material Sourcing

Our Group also undertakes research in the areas of sourcing to facilitate cost competitiveness and quality of building materials, and finding new applications for existing materials.

Areas of research include:-

- (a) Substitute competitive cost products without compromising quality and speed of construction;
- (b) Increasing cross-applications of common components and materials to minimise costs;
- (c) Re-use material to save cost such as utilising aluminium formwork system instead of timber formwork system; and
- (d) Constantly searching for cost competitive suppliers that meet our Group's specifications for quality, prompt delivery and good service.

4. INFORMATION ON OUR GROUP (Cont'd)

4.8 MAJOR SUPPLIERS AND RAW MATERIALS

4.8.1 Major Suppliers

Our Group's major suppliers (i.e. those individually contributing 10% or more of our Group's total purchases for the past three (3) FYE 2007 to FYE 2009) are as depicted in the table below:-

Supplier Name	FYE 2007		FYE 2008		FYE 2009	
	Purchases (RM'000)	Proportion of Group Purchases (%)	Purchases (RM'000)	Proportion of Group Purchases (%)	Purchases (RM'000)	Proportion of Group Purchases (%)
Syn Tai Hung Trading Sdn Bhd	8,028	16.5	11,753	10.9	11,546	15.8
Lafarge Concrete (Malaysia) Sdn Bhd	5,700	11.7	7,479	6.9	7,873	10.8
ICP Marketing Sdn Bhd	5,721	11.8	7,370	6.8	-	-
Total Group's Purchases	48,638		108,125		72,986	

As shown above, to a certain extent, we are dependent on our major suppliers, namely Syn Tai Hung Trading Sdn Bhd and Lafarge Concrete (Malaysia) Sdn Bhd.

For the FYE 2009, Syn Tai Hung Trading Sdn Bhd was our Group's top supplier, accounted for approximately 15.8% of our Group's total purchases. This was mainly for the purchase of steel bars. Apart from Syn Tai Hung Trading Sdn Bhd, our Group could easily source the steel bars from other local suppliers, if required. Within our top twenty (20) suppliers, we have four (4) other suppliers of steel bars.

Lafarge Concrete (Malaysia) Sdn Bhd accounted for approximately 10.8% of our Group's total purchases for the FYE 2009. This was mainly for the purchase of concrete materials. We also source concrete materials from two (2) other suppliers within our suppliers. This would provide us with alternative sources of supply.

For FYE 2007 and FYE 2008, ICP Marketing Sdn Bhd accounted for approximately 11.8% and 6.8% of our Group's total purchases respectively. This was mainly for the purchase of piles. During the FYE 2009, there were no purchases of piles made by our Group as there were no commencements of construction of new project by our Group as piles are mainly used in the early stage of construction during piling. As such, there were no transactions between our Group and ICP Marketing Sdn Bhd in FYE 2009.

Syn Tai Hung Trading Sdn Bhd and Lafarge Concrete (Malaysia) Sdn Bhd have been dealing with us for the last ten (10) and four (4) years respectively. This reinforces the suppliers' stable business relationship with our Group, which will provide the basis for a continuing business relationship.

As part of our Group's philosophy of cultivating long-term supplier relationships, approximately 75% of the top suppliers have been dealing with our Group for nine (9) or more years for the FYE 2009.

4. INFORMATION ON OUR GROUP (Cont'd)

4.8.2 Types, Sources and Availability of Raw Materials/ Inputs

The following are the main materials and services purchased by our Group for our business operations for the FYE 2009:-

	Value of Purchases	Proportion of Total Purchases	Sources of Supply	
	(RM'000)	(%)	Local (%)	⁽²⁾ Import (%)
MATERIALS	42,331	58.0		
Iron and steel materials	19,973	27.4		
- Steel reinforcement bar	16,644	22.8	100	-
- Others ^(b)	3,329	4.6	100	-
Concrete materials ^(c)	14,528	19.9	100	-
Plumbing and fittings	1,102	1.5	100	-
Tiles	3,249	4.4	100	-
Others ^(d)	3,479	4.8	100	-
SERVICES	30,655	42.0	100	-
Carpentry and masonry work	4,623	6.3	100	-
Piling work	3,293	4.5	100	-
Bar bending work	1,993	2.7	100	-
Electrical and wiring work	1,905	2.6	100	-
Monitor work	1,700	2.3	100	-
Blasting and bricklaying work	1,640	2.2	100	-
Installation of lift	1,256	1.7	100	-
Installation of plaster ceiling	1,169	1.6	100	-
Retaining wall work	899	1.2	100	-
Air conditioning system work	693	1.0	100	-
System formwork	678	1.0	100	-
Cassion work	668	1.0	100	-
Waterproofing work	619	0.8	100	-
Foundry work	551	0.8	100	-
Tiling work	535	0.7	100	-
Painting work	529	0.7	100	-
Roofing work	522	0.7	100	-
Plumbing and sanitary work	509	0.7	100	-
Water feature, pumps and water system work	481	0.7	100	-
Others ^(e)	6,392	8.8	100	-
Total	72,986	100.0	100.0	-

Notes:-

- (a) Include stockist;
 (b) Includes steel reinforced fabric/ mesh and ironmongery;
 (c) Includes concrete, cement, sand and aggregates, and sand bricks;
 (d) Includes plywood, other timber materials and door, other metal and aluminium products, and sanitary ware and fittings; and
 (e) Includes furniture, fittings and gym equipment, aluminium products, soil work, roadworks and drainage, roller shutter installations, earthwork, drilling, installation of gas systems and others.

4. INFORMATION ON OUR GROUP (Cont'd)

For the FYE 2009, our Group's total purchases of materials and services amounted to approximately RM73.0 million, excluding fuel oil, electricity and other consumables.

For the FYE 2009, purchases of materials for the building and construction operations accounted for approximately 58.0% of our Group's total purchases while the remaining of approximately 42.0% were for the purchase of external services.

Our Group sources all of its materials and services from local manufacturers and suppliers.

(i) Material Purchased

(a) Iron and Steel Materials

As our Group is an integrated property developer which also undertake building and construction, the usage of iron and steel materials constitute the largest raw materials used in our operations.

For the FYE 2009, purchases of iron and steel materials represented approximately 27.4% of our Group's total purchases of materials and services.

Within iron and steel, purchases of steel reinforcement bars accounted for approximately 22.8% of our Group total purchases, which amounted to approximately RM16.6 million for the FYE 2009.

Steel reinforced fabric/ mesh and ironmongery, metal and aluminium represented approximately 4.6% of our Group's total purchases for the FYE 2009.

Our Group sources all of its iron and steel materials from local manufacturers and suppliers.

(b) Concrete Materials

Cement and concrete materials are the next largest materials purchased by our Group used in building and construction operations.

For the FYE 2009, purchases of concrete materials including sand and aggregates, and bricks accounted for approximately 19.9% of our Group's total purchases of materials and services.

With adequate sources of local and overseas supply, thus far, our Group has not experienced any shortages in the supply of concrete materials.

4. INFORMATION ON OUR GROUP (Cont'd)

(c) Other Building Materials

Our Group also utilises a wide range of other building materials for our building and construction operation.

Some of the other building materials include plumbing and fittings, tiles, sanitary ware and fittings, plywood and timber products.

Thus far, our Group has not experienced any shortages in the supply of other building materials.

(ii) Services

Our Group also sub-contracts some of our work to external parties. These services represented approximately 42.0% of our Group's total purchases of materials and services for the FYE 2009.

In the Property Development Industry, it is common for operators to use sub-contractors as it is not always practical or economical to undertake the full diverse range of services required in the full property development and management cycle.

Our Group out sources non-core works for the following reasons:-

- (a) Enables our Group to focus on developing our core competencies in areas that will enhance our competitive advantages;
- (b) Enables our Group to have a flexible workforce to meet labour requirements for projects of varying sizes; and
- (c) Minimise overheads in areas where work undertaken are irregular or there is insufficient volume of work to maintain a full-time workforce.

The expenses incurred for electrical and wiring works, and piling works accounted for 2.6% and 4.5% of our Group's total purchases of materials and services for the FYE 2009 respectively.

Price volatility such as land cost and raw material cost may affect our Group adversely. Increase in the cost of land and raw material is an inherent risk in the Property Development Industry and may affect our profit margin. If costs of raw materials increase after the sale of the properties, we are unable to factor such increase in our selling prices. However, our Group shall study and monitor carefully the demand of the type of properties in considering the type of raw materials to be used for our projects including the affordability of the potential buyers on such properties after taking into account of the cost of the land which is mainly determined by the location of the land before commencing the development of the properties.

4. INFORMATION ON OUR GROUP (Cont'd)

4.9 MARKETING INITIATIVES AND MAJOR CUSTOMERS**4.9.1 Modes of Marketing/ Distributions/ Sales****(i) Marketing Strategies**

The sales and marketing team of our Group utilises the following marketing strategies to sustain and expand our Group's business:-

- (a) Markets ourselves as an integrated property developer incorporating property development such as identification and acquisition of land, design and build, supporting services such as architectural and engineering consultancy, provision of interior design services, and interior fit-out works as well as property management services;
- (b) Maximise from our competitive advantage of having in-house technical skilled capabilities such as structural engineers, architects, multi-disciplined engineers and interior designers that are involved directly from end-to-end to develop quality properties;
- (c) Continue to build and promote our brand with the aim of increasing awareness and building a strong image and brand equity;
- (d) Continually provide innovative and quality developments with an appropriate mix of developments to establish our reliability as a property developer, thus creating customer royalty; and
- (e) Keeping abreast of new architectural and engineering designs and trends to stay ahead of the competition as well as to better meet the needs of potential customers.

As part of our strategy to promote our products, as well as identify new areas of opportunities, our Group also actively participates in exhibitions by setting-up a display booth to exhibit our Group's developments.

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4. INFORMATION ON OUR GROUP (Cont'd)

Our Group has participated in the following exhibitions:-

Exhibitions Participated	Location	Date of Exhibitions	Organiser
Penang Fair in Medan – Property Exhibition	Medan, Indonesia	02 April 2010 to 04 April 2010	Penang State Government
Penang International Property (“PIP”) Fair	Penang	19 March 2010 to 21 March 2010	PIP Creation Sdn Bhd
STAR Property Fair 2009	Penang	11 September 2009 to 13 September 2009	Star Publications (M) Sdn Bhd
PIP Fair	Penang	27 March 2009 to 29 March 2009	PIP Creation Sdn Bhd and REHDA, Penang Branch
STAR Property Fair 2008	Penang	5 September 2008 to 7 September 2008	Star Publications (M) Sdn Bhd
MAPEX Property Fair	Penang	11 July 2008 to 13 July 2008	REHDA, Penang Branch
Trend Home & Interiors Expo 2008	Medan, Indonesia	3 June 2008 to 8 June 2008	Trans Kreasindo Productions
REI Expo 2008	Medan, Indonesia	25 March 2008 to 30 March 2008	CV PROCOMM
PIP Fair	Penang	14 March 2008 to 16 March 2008	PIP Creation Sdn Bhd and REHDA, Penang Branch
Medan Property Exhibition	Medan, Indonesia	19 October 2007 to 24 October 2007	MetaNoia Property
The STAR Property and Home Fair 2007	Penang	21 September 2007 to 23 September 2007	Star Publications (M) Sdn Bhd
Medan Property Exhibition	Medan, Indonesia	7 September 2007 to 9 September 2007	MetaNoia Property
Maybank Next2U Carnival	Penang	7 September 2007	Malayan Banking Berhad
FIABCI: Best of Malaysian Property Exhibition	Singapore	18 August 2007 to 19 August 2007	FIABCI Asia Pacific Regional Secretariat
MAPEX Exhibition	Penang	13 July 2007 to 15 July 2007	REHDA, Penang Branch
Medan Roadshow	Medan, Indonesia	27 June 2007 to 30 June 2007	Henry Butcher, Penang
Program Bandaraya Berkembar Pulau Pinang - Medan	Medan, Indonesia	25 May 2007 to 27 May 2007	MPPP and Pemerintah Kota Medan
FIABCI Asia Pacific Property Exhibition 2007	Singapore	4 May 2007 to 6 May 2007	FIABCI Asia Pacific Regional Secretariat
PIP Showcase	Penang	16 March 2007 to 18 March 2007	PIP Creation Sdn Bhd and supported by Penang State Housing Committee and REHDA, Penang Branch
Penang Furniture Exhibition (PENFURNEX)	Penang	1 September 2006 to 3 September 2006	Penang Furniture Manufacturers and Dealers Association
Malaysia Property Expo (MAPEX 2006)	Penang	21 July 2006 to 23 July 2006	REHDA, Penang Branch
ICSC Asia Expo 2006	Singapore	11 July 2006 to 13 July 2006	International Council of Shopping Centres, Inc
PIP Showcase	Penang	12 May 2006 to 14 May 2006	PIP Creation Sdn Bhd and supported by Penang State Housing Committee

4. INFORMATION ON OUR GROUP (Cont'd)

As part of the sales and marketing programme, our Group has a sales booth set-up in Gurney Plaza, Penang to continually sell and promote our Group's properties during certain periods.

In 2007, our Group also set-up a sales office in Medan, Indonesia to expand our market coverage outside Malaysia.

In addition, our Group also attended conferences and seminars to study and understand the current property trends and consumer preferences. Our Group attended the following conferences and seminars:-

- (a) FIABCI Smart Property Investment Seminar 2007 in Malaysia, 2007;
- (b) International Council of Shopping Centre Asia Expo 2006, Singapore;
- (c) Creating New Business and Investment Opportunities in the Property and Housing Sector in Malaysia, 2006;
- (d) Retail Revolution Asia Congress, Kuala Lumpur, 2006;
- (e) Shanghai Study Tour in 2006, organised by the REHDA;
- (f) International Seminar on Tunnel and Road Technology in China, 2002;
- (g) 10th World Congress on Intelligent Transport System (ITS) in Spain 2003; and
- (h) Business Development Mission to Canada and North America, 2001.

As part of the marketing and promotions programme, our Group also advertises in local and overseas newspapers and magazines.

As at the LPD, our Group has eleven (11) marketing personnel in our sales and marketing division.

(ii) Distribution Channel Strategy

Our Group primarily adopts a direct distribution channel strategy through our own sales and marketing team to sell our products directly to customers.

The direct distribution strategy has its advantages in enabling our Group to work closely with our customers to interact and attain a better understanding of the customers' requirements, which serves as a feedback mechanism for continuous improvements.

4.9.2 Principal Markets

Our Group's principal market is Malaysia as all of our developments are located in Malaysia.

Within the principal local market, it can be segmented as follows:-

- (i) Primary market, where purchasers are residents from Penang where the developments are located; and
- (ii) Secondary market, where purchasers are residents from other states of Malaysia as well as overseas.

4. INFORMATION ON OUR GROUP (Cont'd)

For the FYE 2009, primary market represented approximately 64.4% of our Group's total number of customers. The remaining of approximately 35.6% was represented by the secondary market.

For the FYE 2009, our Group's total number of customers is segmented as follows:-

Place of Residence	Number of Customers	Proportion of total Customers (%)
Malaysia	194	81.2
Penang	154	64.4
Kedah	17	7.2
Kuala Lumpur	7	2.9
Selangor	5	2.1
Perak	5	2.1
Johor	4	1.7
Sarawak	1	0.4
Sabah	1	0.4
Overseas	45	18.8
Hong Kong	11	4.7
United Kingdom	7	2.9
Singapore	4	1.7
Indonesia	4	1.7
USA	3	1.4
Australia	2	0.8
Iran	2	0.8
Japan	2	0.8
Canada	2	0.8
France	2	0.8
Netherland	2	0.8
China	1	0.4
New Zealand	1	0.4
Saudi Arabia	1	0.4
Switzerland	1	0.4
Total	239	100.0

The total cumulative customer base of our Group is disclosed in Section 4.9.3 of this Prospectus.

Our Group's coverage of residential and commercial properties enables our Group to cover both the consumer and the business market segments. This will provide diversification to ensure that our business is not overly dependent on one sector of the property market.

4. INFORMATION ON OUR GROUP (Cont'd)

(i) Location of Properties

Markets for our Group's properties are mainly predicated by the location of our Group's developments.

As at the LPD, all of our Group's developments which are located in Penang Island and Mainland Penang are as follows:-

- (a) Tanjung Tokong;
- (b) Bukit Gambier;
- (c) Batu Uban;
- (d) Georgetown;
- (e) Batu Feringgi; and
- (f) Bukit Mertajam.

The focus on property development in Penang, especially Penang Island is prudent based on the following observations:-

(a) Population Statistics

Between 2005 and 2009, population in Penang grew at an average annual rate of 1.8%. In 2009, population of Penang increased by 2.0% to approximately 1.6 million people. In 2009, Penang (Island and Mainland) recorded the second highest population density at 1,505 persons per square kilometre.

In contrast, the third highest population density was Labuan, which recorded a population density of 978 persons per square kilometre, followed by Selangor at 635 persons per square kilometre.

(b) Performance of Property Transactions in Penang

Between 2004 and 2008, value of property transactions for Penang registered an average annual growth rate of 6.5%. During the first half of 2009, value of property transactions for Penang decreased by 7.6% to RM1.6 billion compared to the same period in 2008.

For our future plans, our Group intends to venture into new geographical area including:-

- (a) Penang (Mainland) - Bukit Mertajam; and
- (b) Perak - Tanjung Malim.

The expansion into neighbouring locations will enable our Group to cover a wider catchment area, as purchases of properties are mainly localised.

(ii) Market Access

Our Group's success in accessing the local market are substantiated by a total customer base of 2,335 customers as at the LPD and a track record of approximately 96% take-up from a total of 1,717 completed units of various types of properties.

4. INFORMATION ON OUR GROUP (Cont'd)

For the FYE 2009, foreign investors accounted for approximately 18.8% of our Group's total revenue indicating our Group's ability to gain access to customers outside of Malaysia.

In 2007, our Group established a sales office in Medan, Indonesia to further gain access to customers in Indonesia.

Currently, our Group's market access is localised to Penang where all of our developments are located.

Part of the future plans of our Group is to expand into other states such as Tanjung Malim in Perak to undertake a mixed property development.

4.9.3 Major Customers

As our Group is mainly involved in property development, our Group does not have major customers (i.e. those individually contributing 10% or more of our Group's total revenue for the past three (3) FYE 2007 to FYE 2009).

Our Group's customer base can be divided into individuals and companies, which can be further segmented into the following:-

- (i) Owner-occupier (residential and office)/ owner-operator (retail); and
- (ii) Investor.

As at 31 December 2009, approximately 73.8% of our Group's customers were from Penang. As at 31 December 2009, our Group's total cumulative customer base amounted to 2,278 customers, which can be further segmented as follows:-

	Cumulative Number of Customers	Proportion of Total Number of Customers (%)
Malaysian	1,976	86.7
Foreigner	302	13.3
Total	2,278	100.0

As at 31 December 2009, approximately 86.7% of our Group's total cumulative customers were from 12 states and federal territories within Malaysia. The remaining of approximately 13.3% was spread across 21 overseas countries.

The nature of the business is such that property sales are commonly on a one-off basis. However, repeat business is not uncommon when past customers purchase additional properties. This is due to our Group's established reputation for quality and reliability of developments undertaken.

4. INFORMATION ON OUR GROUP (Cont'd)

4.10 SEASONALITY


Generally, the property market is not subjected to any seasonality factors.

4.11 BRAND NAMES, PATENTS, TRADEMARKS, LICENCES, TECHNICAL ASSISTANCE AGREEMENTS, FRANCHISES AND OTHER INTELLECTUAL PROPERTY RIGHTS

Save as disclosed below, as at the LPD, our Group does not presently hold any brand names, patents, trademarks, licences, technical assistance agreements, franchises and other intellectual property rights.

Under the Trade Mark Act 1976 and Trade Mark Regulations 1997, all trademarks have to be registered before a trademark can be adopted in relation to any goods or services. The Registrar of Trade Marks is the authority for the registration of trademarks in Malaysia. Registration of trademarks shall be valid for a period of ten (10) years and may be renewed from time to time.

Our Group has registered its "Ivory" logo as trademark under Class 37, the details are as follows:-

Trademark	Services	Status of registration	Date of Certificate	Trademark No.	Status of Usage
 "Ivory" logo	Building construction, repair, installation services, all included in Class 37	Registered	10 February 2004*	00006571	In use

Note:-

* Registered under IASB as the proprietor of the trademark since 26 May 2000 in respect of the abovementioned services.

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4. INFORMATION ON OUR GROUP (Cont'd)**4.12 EMPLOYEES**

Our Group's employment structure as at the end of the past three (3) FYE 2007 to FYE 2009 were as follows:-

Category of Employees	As at 31 December 2007	As at 31 December 2008	As at 31 December 2009
Management and Professionals	24	27	27
Sales and Marketing	12	12	16
Architects	9	8	8
Civil and Structural Engineers	9	15	17
Technical Managers	11	12	12
Other Technical Personnel	19	19	27
Urban Planners	11	10	9
Executives/ Officers	13	19	22
Draftsmen	16	21	19
Interior Designers	15	17	18
Quantity Surveyors	15	18	14
Property Management Personnel	79	108	118
Procurement Personnel	3	4	5
Other Multimedia Personnel	15	16	15
Clerical and Administrative Personnel	29	39	47
Construction Personnel			
- Site Supervisors	8	12	10
- Skilled and semi-skilled workers	18	25	22
- General workers	-	-	3
Food and Beverages Personnel	-	-	13
TOTAL	306	382	422

Our Group does not have any temporary employees. Our Group's entire workforce is located in Malaysia.

The increase in total number of employees as at 31 December 2008 was mainly due to the increase in workforce for projects under construction, namely Penang Times Square – Phase 2 and Moonlight Bay, and increase in workforce for property management as a result of the completion of Penang Times Square – Phase 1 project.

The increase in total number of employees as at 31 December 2009 was mainly due to the increase in workforce for additional project under construction, namely Island Resort – Phase 2 and for the new projects expected to commence development at the end of 2009 and in 2010 in relation to the Aston Villa - Phase 2 and Phase 4, and Mount Erskine Development – Phase 1 projects respectively.

As at the LPD, our Group has a total of eighteen (18) foreign workers comprising Nepalese. The foreign workers are all on contractual basis.

Our Group's employees are not part of any union.

4. INFORMATION ON OUR GROUP (Cont'd)

The management of our Group is of the opinion that our dedicated, efficient and trained employees are instrumental to our Group's success. The management of our Group enjoys a good working relationship with our employees. Our Group has not been involved in any industrial dispute with any of our employees as of the LPD.

The management of our Group has from time to time arranged internal and external courses to train our employees. The on-going training and development programmes cover technical and functional courses for our employees.

The following internal and external programmes have been arranged and attended by our employees:-

- (1) Assessment and Repair of Concrete Structures in Tropical Climates
- (2) Construction Industry Development Board (CIDB) Malaysia
- (3) Data Center Solution, Power and Cooling
- (4) Design and Codes on Sprinkler System and Fire Protection Practices
- (5) Design of Slope Reinforcement
- (6) Employer's Guide to Legal Issues of Employment in Malaysia
- (7) Enforcement of Arbitral Awards (Both Domestic and Foreign) in Malaysia – The Procedural and Substantive Laws
- (8) Enhancing Productivity in Challenging Economic Climate
- (9) Excavation and Retaining Walls
- (10) Financial Instruments
- (11) Forensic Engineering for Civil, Structural and Geotechnical Engineers - Technical and Legal Issues
- (12) Fundamental Principles of Deferred Taxation (MIA)
- (13) Geosynthetics for Reinforced Soil and Marine Structure Application
- (14) Handling Misconduct and Conducting Domestic Inquiries
- (15) Hazard Identification, Risk Assessment Control and Introduction to Internet OSH Auditing
- (16) Housing Development Act 2007
- (17) Improving OSC Delivery System for Simultaneous Application for Planning Permission and Land Development
- (18) International Financial reporting standard (IFRS) 2009 Version Course
- (19) International Green Building Conference
- (20) Ke Arah Keselamatan, Kesihatan and Perlindungan Social di Tempat Kerja – Tanggungjawab Majikan dan Pematuhan Akta
- (21) Limiting Industrial Court Award Payouts
- (22) (MAISCA) Understanding Striking Off Application and Procedures, Voluntary Winding Up and Registration of Document for Court Winding Up, Offering of Interest Scheme
- (23) Maximising value Minimising Costs for Excellence (International Construction Conference 2009)
- (24) New Trends in Urban Planning and Development
- (25) Penang Government Direction on Property Industry and the General Company
- (26) Penang Real Estate Conference
- (27) Preparing for and Managing Crisis Events in the Shopping Centre Industry
- (28) Presentation on New Cement and Concrete Standards for Quality Construction
- (29) Priceless Gems of Creativity Seminar December 2009
- (30) PVC Piping System – The Ultimate Choice for Water Delivery System
- (31) Real Estate Leadership: Strategies for the 21st Century
- (32) Real Estate Market Outlook and Opportunities for Northern Region

4. INFORMATION ON OUR GROUP (Cont'd)

- (33) Rehda Property Leader Forum 2010
- (34) Solar Energy Systems in Malaysia
- (35) Structural Concrete Maintenance
- (36) Talk on "Introduction to Green Building Index"
- (37) Tax Conference
- (38) Taxation of Permanent Establishment
- (39) Technical Course on Site Investigation
- (40) Technical Presentation on Weld Mesh/ Cut and Bent Reinforcing Steel
- (41) Technical Talk on Reinforced Concrete Building Design Using Esteem 7.5
- (42) The Current Global Financial Crisis: Its Impact and Implications for Malaysia
- (43) Understanding ISO 9001:2008 requirement (latest edition)
- (44) Viability of Hill Land Development
- (45) Workshop on Tax Restructuring on Land Transaction

4.13 PRODUCTION/ OPERATING FACILITIES

4.13.1 Location of Business

(i) Principal Assets

Our Group's principal asset is located at the following place:-

Principal Assets	Approximate Built-up Area (square feet)	Location
2-storey detached building used as an office known as the Birch House	16,555	Birch House, No. 73, Jalan Dato Keramat, 10150 Georgetown, Penang
3 units of 5-storey shop office used as an office known as Ivory Design Studio	18,019	4, 4A, 4B, 4C and 4D, 6, 6A, 6B, 6C and 6D, 8, 8A, 8B, 8C and 8D, Jalan Kampung Jawa Lama, 10150 Penang

(ii) Operating Facilities/ Principal Place of Business, Marketing and Distribution Network

Our Group's operating facilities and principal place of business are located at the following place:-

Facilities	Approximate Built-up Area (square feet)	Location
Head office for all operations	16,555	Birch House, No. 73, Jalan Dato Keramat, 10150 Georgetown, Penang
	18,019	4, 4A, 4B, 4C and 4D, 6, 6A, 6B, 6C and 6D, 8, 8A, 8B, 8C and 8D, Jalan Kampung Jawa Lama, 10150 Penang

4. INFORMATION ON OUR GROUP (Cont'd)

Facilities	Approximate Built-up Area (square feet)	Location
Management Office	798	2-5-3A, Plaza Ivory, Halaman Bukit Gambir, 11700 Penang
	1,151	3A-03-02, Tanjung Park Condominium, Persiaran Lengkuas 1, Tanjung Tokong, 10470, Penang
	775	108-15-10, Persiaran Lengkuas, Tanjung Tokong, 10470 Penang
	575*	2-B4-01, The View Condominium, Jalan Batu Uban 5, 11700, Batu Uban Penang
	2,550	77-5-2, Plaza Birch, Jalan Dato Keramat, 10150 Georgetown, Penang
Complex Management Office	3,680	77-4B-1, Plaza Birch, Jalan Dato Keramat, 10150 Georgetown, Penang
	3,680	77-4C-1, Plaza Birch, Jalan Dato Keramat, 10150 Georgetown, Penang
Graphic Workshop	5,264	77-B-1, Plaza Birch, Jalan Dato Keramat, 10150 Georgetown, Penang
Security and CCTV Office	3,256	77-B-2 and 77-B-3, Plaza Birch, Jalan Dato Keramat, 10150 Georgetown, Penang
Car Park Operator Office	3,680	77-4A-1, Plaza Birch, Jalan Dato Keramat, 10150 Georgetown, Penang
Medan Sale Office	5,016	Jalan Letjen S Parman, No.207-A, Medan 20112 Sumatera Utara Indonesia

* Including security office with a built-up area of approximately 376 square feet.

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4. INFORMATION ON OUR GROUP (Cont'd)

4.13.2 Production/ Operating Capacities and Output

As at 31 December 2009, our Group has invested approximately RM18.0 million in machinery and equipment for our operations since the commencement of our operations.

The major machinery and equipment of our Group for the FYE 2009 are as follows:-

Major Machinery and Equipment	Number of Units	Capacity	Audited Net Book Value as at 31 December 2009 RM
Tower crane	2	2.6 tonnes	^(a)
Passenger hoist (twin cage)	2	2.0 tonnes/ cage	^(a)
Crawler crane	2	45.0 – 50.0 tonnes	^(a)
Rough terrain crane	2	35.0 tonnes	^(a)
Hydraulic excavator	7	20.0 – 30.0 tonnes	746,342
Hydraulic excavator with hydraulic hammer	1	20.0 tonnes	74,813
Lorry	4	1.0 – 10.0 tonnes	22,933
Skid steer loader	1	635 kilogram	^(a)
Vibrator roller	1	^(b)	119,000
Generator set	6	30.0 – 300.0 kilo-volt ampere	123,163
Air-compressor	9	4.0-37.9 kilowatt	28,617
Water pump	22	^(b)	34,502
Survey instruments - Electronic totalstation	8 sets	^(b)	45,945
High pressure concrete pump	1	136 kilowatt	327,283
Air conditioning chilled water plant ^(c)	1	500 – 1000 refrigerant tonnes	8,386,875
Carpark system ^(c)	1	Not applicable	1,029,005
Prepayment meter system ^(c)	1	Not applicable	621,827

Notes:-

(a) Fully depreciated.

(b) The equipment comprising of tools which do not have capacity.

(c) Pledged to a licensed bank by way of a debenture incorporating fixed and floating charge for a loan.

Based on the above operating capacities, our Group does not foresee having any operating capacities constrain.

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4. INFORMATION ON OUR GROUP (Cont'd)**4.13.3 Material Capital Expenditure and Divestitures**

Save as disclosed below, we did not incur any material capital expenditure for the past three (3) FYE 2007 to FYE 2009 and up to LPD:-

Asset Type	Transaction Value			
	FYE 2007	FYE 2008	FYE 2009	As at LPD
	RM'000	RM'000	RM'000	RM'000
Freehold land	-	3,650	103	-
Site equipment				
- Excavators	340	690	-	-
- Generator	-	44	-	-
- Electronic totalstation	-	23	-	-
- Hydraulic breaker	95	-	-	-
- Vibrating compactor	238	-	-	-
- High pressure concrete pump	-	538	-	-
- Pulverizer	-	143	-	-
- Forklifts	-	155	-	-
- Air conditioning chilled water plant	-	9,450	-	-
- Car park system	-	-	1,103	-
- Prepayment meter system	-	-	666	-
- Water pumps	-	-	16	-
- Public announcement system	-	-	-	31
Capital in progress	-	-	869	-

We had no material divestitures in the past three (3) FYE 2007 to FYE 2009 and up to LPD.

As at LPD, save as disclosed above, our Group does not have any material capital expenditure currently in progress.

4.13.4 Material Plans to Construct, Expand or Improve Facilities

As at LPD, we have no immediate plans to construct, expand or improve on existing facilities.

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4. INFORMATION ON OUR GROUP (Cont'd)

4.14 APPROVALS, MAJOR LICENCES AND PERMITS OBTAINED

Details of the approvals obtained by our Company for the Listing from the SC, ECU and MITI together with the conditions imposed by these authorities and status of compliance are set out in Section 6.1 of this Prospectus. Other approvals, major licences and permits issued to our Group in order for us to carry out our operations, other than those pertaining to general business registration requirements are as follows:-

4.14.1 Major Approvals Under the Possession of Our Group

Major approvals under the possession of our Group are as follows:-

(i) IASB

No.	Type of Approval	Authority	Effective Date/ Date of Expiry	Locations of Assets	Major Conditions	Compliance Status
1.	Registration of the Building Operational Site/ Engineering Construction Work (Proposed development for commercial and condominium)	Jabatan Keselamatan dan Kesihatan Pekerjaan Pulau Pinang ("Jabatan") (Ministry of Human Resource)	21.12.2005/ Not applicable	Penang Times Square, Jalan Dato' Keramat, Penang	<p>(a) IASB shall comply with the rules and regulations under Factory and Machinery Act 1967 (Act 139), especially to Building Operational and Construction Engineering Work Safety, 1986 and Occupational Safety and Health Act, 1994 (Act 514) in respect of all building construction/ engineering works.</p> <p>(b) IASB shall report to the Jabatan from time to time of any new and additional machinery which is used at the construction site for review and record purposes.</p> <p>(c) Machineries such as steam boiler, pressure container and lifting machine (for example tower crane, passenger/ materials hoist, power scaffold, piling frames and allied equipments etc.) shall require a certificate of fitness for operation. All tower crane operators, mobile crane and crawler crane shall require competent operators who registered with the Jabatan. The Jabatan shall be contacted earlier for the approval of setting up/ installing, erecting, utilising, demolishing or dismantling the machine, such as tower crane, passenger/ materials hoist and power scaffold.</p> <p>(d) IASB shall register with the Jabatan and obtain the approval from Local Enforcement and Environmental Department if concrete machine is used and built at the construction site. The items (b), (c) and (d) as stated in JKL 105 shall be filed and enclosed with the draft plan of the machinery's location before submitting to the Jabatan for review and further action.</p>	Complied

4. INFORMATION ON OUR GROUP (Cont'd)

No.	Type of Approval	Authority	Effective Date/ Date of Expiry	Locations of Assets	Major Conditions	Compliance Status
(e)					IASB shall comply with Rules 75 – 87 (Building Operation and Engineering Construction Work) (Safety), Factory and Machinery 1986 if scaffolding is built at the working place. Installation, examination and dismantling of the scaffolding work have to be done by competent scaffolder who is registered with the Jabatan.	Complied
(f)					The designated persons appointed for the work activities such as public vehicular traffic control, formworks, shores, reshores, safety nets, safety belts, scaffolds, demolition, handling of explosives, piling, excavation etc as stated under Rules (Building Operation and Engineering Construction Safety Work) Factory and Machinery 1986 shall be appointed from knowledgeable and professional workers. Their observations and execution of daily responsibilities shall be recorded for further review by the officer of the Jabatan. The list of appointment shall be updated from time to time.	Complied
(g)					According to Section 32(1), Occupational Safety and Health Act 1994, any emergencies which involved worker's casualty or which caused serious injury to the body parts, shall be reported to the Jabatan immediately via telephone and give written notification by using Form JKPP 6 within 7 calendar days. Any dangerous occurrences on the machinery etc which may threaten the safety of the workers and public shall be reported to the Jabatan immediately while any accident which may restrain workers from performing their duty for more than 4 days shall be reported to the Jabatan using Form JKPP 6 within 7 calendar days. Other light injury shall be recorded in the accident registration record book and presented to the officers for their review when being instructed by the officers.	Complied

4. INFORMATION ON OUR GROUP (Cont'd)

No.	Type of Approval	Authority	Effective Date/ Date of Expiry	Locations of Assets	Major Conditions	Compliance Status
					(h) IASB shall prepare and check Occupational Safety and Health Policy, Organisation Accounting and Safety Accounting from time to time to update the development of law, technology and the environment of the working site. IASB shall inform all levels of management and employee as well as other workers the policy which has been enforced by the Managing Director. This policy shall be displayed on the notice board for public awareness.	Complied
					(i) The Safety Committee shall appoint a Project Manager as the Chairman for the committee in order to comply with the Occupational Safety and Health Rules, 1997.	Complied
					(j) An accredited Occupational Safety and Health Officer shall be appointed in order to comply with the Occupational Safety and Health Rules, 1997.	Complied
					(k) IASB shall organise an effective Safety Management System and to identify the hazards or danger that might happen by implementing practical and appropriate steps during the construction work to avoid any danger, disturbance and damages to the public at all time.	Complied
					(l) IASB shall be responsible for any construction activities implemented by independent specialised contractors such as Tenaga Nasional Berhad, Indah Water Konsortium, Jabatan Bekalan Air, Telekom and others.	Complied
					(m) IASB shall keep records for (a) to (d) above at the working place and present to the officer of the Jabatan when requested during the statutory inspection.	Complied
					(n) IASB shall present monthly report regarding the performance of the safety management system to the Jabatan for further review on the 7 th day of each month until completion of the respective projects.	Complied
					(o) IASB shall give written notice to the Jabatan from time to time.	Complied

4. INFORMATION ON OUR GROUP (Cont'd)

No.	Type of Approval	Authority	Effective Date/ Date of Expiry	Locations of Assets	Major Conditions	Compliance Status
1.	Aston Villa Planning approval - Phase 1 (No. (31)dim.MPSP/70/39-55/4)	MPSP	25.04.2007/ ^(a) 24.04.2008 (refer to item (3) below)	Lots 654, 655, 656, 657, 658 and part of Lots 715, Seksyen 4, Bandar Bukit Mertajam, Seberang Perai Tengah.	No major condition is attached	Not applicable
2.	Planning approval (surrendered and realienated at council level) - Phase 1 (No. MPSP/70/39-55/4(SP))	MPSP	19.09.2007/ Not applicable	Lots 654, 655, 656, 657, 658, Seksyen 4, Bandar Bukit Mertajam, Seberang Perai Tengah.	No major condition is attached	Not applicable
3.	1 st Extension planning approval - Phase 1 (No. (38)dim.MPSP/70/39-55/4)	MPSP	25.04.2008/ ^(a) 24.04.2009 (refer to item (4) below)	Lots 654, 655, 656, 657, 658 and part of Lots 715, Seksyen 4, Bandar Bukit Mertajam, Seberang Perai Tengah.	No major condition is attached	Not applicable
4.	2 nd Extension planning approval - Phase 1 (No. MPSP/70/39-55/4(40))	MPSP	25.04.2009/ ^(a) 24.04.2010	Lots 654, 655, 656, 657, 658 and part of Lots 715, Seksyen 4, Bandar Bukit Mertajam, Seberang Perai Tengah.	No major condition is attached	Not applicable
5.	Planning approval - Phase 2, Phase 3 and Phase 4 (No. MPSP/70/39-55/5)	MPSP	18.04.2008/ ^(a) 17.04.2009 (refer to item (6) below)	Lots 715, 721, 405, 413, 417 and part of Lots 654, 655 and 656, Seksyen 4, Bandar Bukit Mertajam, Seberang Perai Tengah.	No major condition is attached	Not applicable
6.	1 st Extension planning approval - Phase 2, Phase 3 and Phase 4 (No. (134)dim.MPSP/70/39-55/5)	MPSP	18.04.2009/ ^(a) 17.04.2010	Lots 715, 721, 405, 413, 417 and part of Lots 654, 655 and 656, Seksyen 4, Bandar Bukit Mertajam, Seberang Perai Tengah.	No major condition is attached	Not applicable
7.	Planning approval (surrendered, realienated and sub-divided at council level) - Phase 2, Phase 3 and Phase 4 (No. MPSP/70/39-55/5(SP))	MPSP	23.04.2008/ Not applicable	Lots 405, 413, 417, 715 and 721 and plot 16 -103 Seksyen 4, Bandar Bukit Mertajam, Seberang Perai Tengah.	No major condition is attached	Not applicable
8.	Building approval - Phase 1 (No.(8) dim.MPSP/40/30-55/12)	MPSP	29.06.2007/ ^(b) 28.06.2008 (refer to item (9) below)	Lots 654, 655, 656, 657, 658 and part of Lots 715, Seksyen 4, Bandar Bukit Mertajam, Seberang Perai Tengah.	No major condition is attached	Not applicable

4. INFORMATION ON OUR GROUP (Cont'd)

No.	Type of Approval	Authority	Effective Date/ Date of Expiry	Locations of Assets	Major Conditions	Compliance Status
9.	1 st Renewal building approval - Phase 1 (No. (13)d/m.MPSP/40/30-55/12)	MPSP	10.10.2008/ ^{(b)/(c)} 28.06.2009 (refer to item (10) below)	Lots 654, 655, 656, 657, 658 and part of Lots 715, Seksyen 4, Bukit Mertajam, Seberang Perai Tengah.	No major condition is attached	Not applicable
10.	2 nd Renewal building approval - Phase 1 (No. (16)d/m.MPSP/40/30-55/12)	MPSP	19.03.2010/ ^{(b)/(c)} 28.06.2010	Lots 654, 655, 656, 657, 658 and part of Lots 715, Seksyen 4, Bukit Mertajam, Seberang Perai Tengah.	No major condition is attached	Not applicable
11.	Building approval - Phase 2 (No. (14) d/m.MPSP/40/20-55/2)	MPSP	30.01.2008/ ^(b) 29.01.2009 (refer to item (12) below)	Lots 654, 655, 715, 656 and 721, Seksyen 4, Bandar Bukit Mertajam, Seberang Perai Tengah.	No major condition is attached	Not applicable
12.	1 st Renewal building approval - Phase 2 (No. (45)d/m.MPSP/40/20-55/2)	MPSP	27.03.2009/ ^(b) 29.01.2010 (refer to item (13) below)	Lots 654, 655, 715 and part of Lots 656 and 721, Seksyen 4, Bandar Bukit Mertajam, Seberang Perai Tengah.	No major condition is attached	Not applicable
13.	2 nd Renewal building approval - Phase 2 (No. (52)d/m.MPSP/40/20-55/2)	MPSP	26.03.2010/ ^{(b)/(c)} 29.01.2011	Lots 654, 655, 715 and part of Lots 656 and 721, Seksyen 4, Bandar Bukit Mertajam, Seberang Perai Tengah.	No major condition is attached	Not applicable
14.	Amended building approval - Phase 2 (No. (36)d/m.MPSP/40/20-55/2)	MPSP	07.11.2008/ ^(b) 06.11.2009 (refer to item (15) below)	Lots 654, 655, 715 and part of Lots 656 and 721, Seksyen 4, Bandar Bukit Mertajam, Seberang Perai Tengah.	No major condition is attached	Not applicable
15.	1 st Renewal amended building approval - Phase 2 (No. (49)d/m.MPSP/40/20-55/2)	MPSP	11.12.2009/ ^(b) 06.11.2010	Lots 654, 655, 715 and part of Lots 656 and 721, Seksyen 4, Bandar Bukit Mertajam, Seberang Perai Tengah.	No major condition is attached	Not applicable
16.	Building approval - Phase 4 (No. (11)d/m.MPSP/40/20-55/3)	MPSP	30.01.2008/ ^{(b)/(c)} 29.01.2009	Lots 654, 655, 405, 413, 417 and 656, 715 and 721, Seksyen 4, Bandar Bukit Mertajam, Mukim S4, Seberang Perai Tengah.	No major condition is attached	Not applicable
17.	Amended building approval - Phase 4 (No. (37)d/m.MPSP/40/20-55/3)	MPSP	13.08.2009/ ^(b) 12.08.2010	Lots 654, 655, 405, 413, 417 and 656, 715 and 721, Seksyen 4, Bandar Bukit Mertajam, Mukim S4, Seberang Perai Tengah.	No major condition is attached	Not applicable

4. INFORMATION ON OUR GROUP (Cont'd)

No.	Type of Approval	Authority	Effective Date/ Date of Expiry	Locations of Assets	Major Conditions	Compliance Status
18.	Building approval – temporary sales office (No. MPSP/40/30-55/11)	MPSP	28.09.2007/ (b)(i)/27.09.2008 (refer to item (19) below)	Lots 654, 655, 656, 657 Seksyen 4, Bandar Bukit Mertajam, Seberang Perai Tengah.	No major condition is attached	Not applicable
19.	1 st Renewal building approval – temporary sales office (No.(13)dim.MPSP/40/30-55/11)	MPSP	03.11.2008/ (b)(i)/27.09.2009	Lots 654, 655, 656, 657 Seksyen 4, Bandar Bukit Mertajam, Seberang Perai Tengah.	No major condition is attached	Not applicable
20.	TNB substation (No.(10)dim.MPSP/40/20-55/4)	MPSP	28.08.2009/ (b)(i)/27.08.2010	Lot 721 Seksyen 4, Bandar Bukit Mertajam, Seberang Perai Tengah.	No major condition is attached	Not applicable
21.	Borang B - sales office (No.MPSP/40/30-55/11)	MPSP	09.10.2007/ Not applicable	Lots 654, 655, 656, 657 and 658, Jalan Aston, Seksyen 4, Bukit Mertajam, Seberang Perai Tengah.	No major condition is attached	Not applicable
22.	Borang B - Phase 1 (No.MPSP/40/30-55/12)	MPSP	18.02.2010/ Not applicable	Lots 654, 655, 656, 657, 658 and 715, Jalan Aston, Seksyen 4, Bukit Mertajam, Seberang Perai Tengah.	No major condition is attached	Not applicable
23.	Borang B - Phase 2 (No.MPSP/40/20-55/2)	MPSP	19.01.2009/ Not applicable	Lots 654, 655, 715 and part of Lots 656 and 721, Seksyen 4, Bandar Bukit Mertajam, Seberang Perai Tengah.	No major condition is attached	Not applicable
24.	Borang B - Phase 4 (No. MPSP/40/20-55/3)	MPSP	01.09.2008/ Not applicable	Lots 654, 655, 405, 413, 417, 656, 715 and 721, Seksyen 4, Bandar Bukit Mertajam, Seberang Perai Tengah.	No major condition is attached	Not applicable
25.	Borang B – TNB substation (No. MPSP/40/20-55/4)	MPSP	26.03.2010/ Not applicable	Lot 721, Seksyen 4, Bandar Bukit Mertajam, Seberang Perai Tengah.	No major condition is attached	Not applicable
1.	City Mall Planning approval (No. MPPP/OSC/PM(444)08(LB))	MPPP	17.10.2009/ (i)/16.10.2010	Lots 1599, 1602, 1603 and 435, Seksyen 2, Bandar Tanjung Tokong, DTL, Jalan Tanjung Tokong, Pulau Pinang.	No major condition is attached	Not applicable
1.	Ivory Eco Park @ Tanjung Malim Planning approval (No. 0001/2008)	MDTM	02.01.2008/ (i)/01.01.2009 (refer to item (2) below)	Lot 17822, Mukim Ulu Bernam Timur, Daerah Batang Padang, Perak Darul Ridzuan	No major condition is attached	Not applicable

4. INFORMATION ON OUR GROUP (Cont'd)

No.	Type of Approval	Authority	Effective Date/ Date of Expiry	Locations of Assets	Major Conditions	Compliance Status
2.	1 st Extension planning approval (No. 0005/2009)	MDTM	20.06.2009/ 19.06.2010	Lot 17822, Mukim Ulu Bernam Timur, Daerah Batang Padang, Perak Darul Ridzuan	No major condition is attached	Not applicable

Notes:-

- (a) The planning approval will not expire on the stipulated date as our Group has obtained the building approval(s) and/or commencement of work approval(s), where applicable.
- (b) The building approval expired/ will expire on this date unless the development work was/ is carried out on the site with the approval of MPPP/ MPSP/MDTM.
- (c) IASB commenced development work on 19 January 2009 which is as per the letter of approval for commencement of work issued by MPSP dated 14 January 2009, i.e. Borang B No. MPSP/40/20-55/2 as disclosed in Section 4.14.1(i), Aston Villa, item no. (23).
- (d) IASB commenced development work on 1 September 2008 which is as per the letter of approval for commencement of work issued by MPSP dated 27 August 2008, i.e. Borang B No. MPSP/40/20-55/3 as disclosed in Section 4.14.1(f), Aston Villa, item no. (24).
- (e) IASB commenced development work on 9 October 2007 which is as per the letter of approval for commencement of work issued by MPSP dated 5 October 2007, i.e. Borang B No. MPSP/40/30-55/11 as disclosed in Section 4.14.1(i), Aston Villa, item no. (21).
- (f) IASB commenced development work on 18 February 2010 which is as per the letter of approval for commencement of work issued by MPSP dated 11 February 2010, i.e. Borang B No. MPSP/40/30-55/12 as disclosed in Section 4.14.1(i), Aston Villa, item no. (22).
- (g) IASB has submitted second renewal for building approval of the temporary sales office and is pending MPSP's approval.
- (h) IASB commenced development work on 26 March 2010 which is as per the letter of approval for commencement of work issued by MPSP dated 22 March 2010, i.e. Borang B No. MPSP/40/20-55/4 as disclosed in Section 4.14.1(i), Aston Villa, item no. (25).

4. INFORMATION ON OUR GROUP (Cont'd)

(ii) IMSB

No.	Type of Approval	Authority	Effective Date/ Date of Expiry	Locations of Assets	Major Conditions	Compliance Status
1.	Moonlight Bay Planning approval (No. JPB/PM/3683(LB))	MPPP	10.11.2004/ (e)/09.11.2005	Lots 35, 89, 197 and part of Lots 36, 196 and 293, Seksyen 2, Bandar Batu Feringghi, Jalan Batu Feringghi, DTL, Pulau Pinang	No major condition is attached.	Not applicable
2.	Amended planning approval (No. JPB/PM/3683(LB)/PT.1)	MPPP	24.08.2006/ Not applicable	Lot 197 and part of Lot 293, Seksyen 2, Bandar Batu Feringghi, Jalan Batu Feringghi, DTL, Pulau Pinang	No major condition is attached.	Not applicable
3.	Planning approval (No. JPB/PM/4929(LB))	MPPP	31.01.2008/ (e)/30.01.2009 (refer to item (4 below)	Lots 35, 89, 197 and part of Lots 36, 196 and 293, Seksyen 2, Bandar Batu Feringghi, Jalan Batu Feringghi, DTL, Pulau Pinang	No major condition is attached	Not applicable
4.	1 st Extension planning approval (No. JPB/PM/4929(LB)/Ext.1)	MPPP	31.01.2009/ (e)/30.01.2010	Lots 35, 89, 197 and part of Lots 36, 196 and 293, Seksyen 2, Bandar Batu Feringghi, Jalan Batu Feringghi, DTL, Pulau Pinang	No major condition is attached	Not applicable
5.	Building approval (B.P No. 40687 (LB))	MPPP	13.04.2005/ (e)/12.04.2006	Lots 35, 89, 197 and part of Lots 36, 196 and 293, Seksyen 2, Bandar Batu Feringghi, Jalan Batu Feringghi, DTL, Pulau Pinang	No major condition is attached	Not applicable
6.	Building approval (No. MPPP/OSC/PB(694)/08(LB))	MPPP	21.05.2009/ (e)/20.05.2010	Lots 35, 89, 197 and part of Lots 36, 196 and 293, Seksyen 2, Bandar Batu Feringghi, Jalan Batu Feringghi, DTL, Pulau Pinang	No major condition is attached	Not applicable
7.	Amended building approval (No.MPPP/OSC/PB(1834)/09(LB)	MPPP	05.05.2010/ (e)/04.05.2011	Lots 35, 89, 197 and part of Lots 36, 196 and 293, Seksyen 2, Bandar Batu Feringghi, Jalan Batu Feringghi, DTL, Pulau Pinang	No major condition is attached	Not applicable
8.	Commencement of work (No. PB No. 40687(LB))	MPPP	21.09.2005/ Not applicable	Lots 35, 89, 197 and part of Lots 36, 196 and 293, Seksyen 2, Bandar Batu Feringghi, Jalan Batu Feringghi, DTL, Pulau Pinang	No major condition is attached	Not applicable
9.	Commencement of work (No. MPPP/OSC/PB(694)/08(LB)	MPPP	25.08.2009/ Not applicable	Lots 35, 89, 197 and part of Lots 36, 196 and 293, Seksyen 2, Bandar Batu Feringghi, Jalan Batu Feringghi, DTL, Pulau Pinang	No major condition is attached	Not applicable
10.	Subdivision approval (No. (11)dim.PTTL/C/LS/14/17/59)	PTG	06.09.2005/ Not applicable	Lots 35, 89, 36 and 293, Seksyen 2, Bandar Batu Feringghi, Jalan Batu Feringghi, DTL, Pulau Pinang	No major condition is attached	Not applicable

4. INFORMATION ON OUR GROUP (Cont'd)

Notes:-

- (a) The planning approval will not expire on the stipulated date as our Group has obtained the building approval(s) and/or commencement of work approval(s), where applicable.
- (b) The building approval expired/ will expire on this date unless the development work was/ is carried out on the site with the approval of MPPP.
- (c) IMSB commenced development work on 21 September 2005 which is as per the letter of approval for commencement of work issued by MPPP dated 21 September 2005, i.e. Commencement of work approval No. PB No. 40687(LB) as disclosed in Section 4.14.1(ii), Moonlight Bay, item no. (7).
- (d) IMSB commenced development work on 25 August 2009 which is as per the letter of approval for commencement of work issued by MPPP dated 25 August 2009, i.e. Commencement of work approval No. MPPP/OSC/PB(694)/08(LB) as disclosed in Section 4.14.1(ii), Moonlight Bay, item no. (8).

(iii) IGSB

No.	Type of Approval	Authority	Effective Date/ Date of Expiry	Locations of Assets	Major Conditions	Compliance Status
1.	Penang Times Square Planning approval - Phase 2, Phase 3 and Phase 4 (No. JPB/PM/4128)	MPPP	23.06.2005/ (a)22.06.2006	^(b) Lots 73, 96, 98, 101, 102, 145, 146, 150, 159, 160, 163, 278, 279, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753 and 767, Seksyen 10, Georgetown, DTL, Jalan Dato Keramat, Pulau Pinang	No major condition is attached.	Not applicable
2.	Planning approval - Phase 2, Phase 3 and Phase 4 (No. JPB/PM/4585)	MPPP	10.08.2006/ (a)09.08.2007	^(b) Lots 73, 96, 98, 101, 102, 145, 146, 150, 159, 160, 163, 278, 279, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753 and 767, Seksyen 10, Georgetown, DTL, Jalan Dato Keramat, Pulau Pinang	No major condition is attached.	Not applicable
3.	Planning approval - (Demolished shop house and surrendered road widen) (JPB/PM/4806)	MPPP	21.11.2006/ (a)20.11.2007	^(b) Lot 766, Seksyen 10, Georgetown, DTL, Jalan Dato Keramat, Pulau Pinang	No major condition is attached.	Not applicable
4.	Planning approval - (Demolished terrace houses) (JPB/PM/4867)	MPPP	07.12.2006/ (a)06.12.2007	^(b) Lot 751 and 752, Seksyen 10, Georgetown, DTL, Jalan Dato Keramat, Pulau Pinang	No major condition is attached.	Not applicable

4. INFORMATION ON OUR GROUP (Cont'd)

No.	Type of Approval	Authority	Effective Date/ Date of Expiry	Locations of Assets	Major Conditions	Compliance Status
5.	Planning approval - Phase 2 (No. JPB/PM/4585 P.T.1)	MPPP	27.09.2007/ (a)26.09.2008	^(b) Lots 73, 96, 98, 101, 102, 145, 146, 150, 159, 160, 163, 278, 279, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753 and 767, Seksyen 10, Georgetown, DTL, Jalan Dato Keramat, Pulau Pinang	No major condition is attached.	Not applicable
6.	Planning approval - Phase 4 (No. JPB/PM/4585 P.T.2)	MPPP	21.02.2008/ (a)20.02.2009 (refer to item (7) below)	^(b) Lots 73, 96, 98, 101, 102, 145, 146, 150, 159, 160, 163, 278, 279, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753 and 767, Seksyen 10, Georgetown, DTL, Jalan Dato Keramat, Pulau Pinang	No major condition is attached.	Not applicable
7.	1 st Extension planning approval - Phase 4 (No. JPB/PM/4585 P.T.2 EXT.1)	MPPP	21.02.2009/ (a)20.02.2010 (refer to item (8) below)	^(b) Lots 73, 96, 98, 101, 102, 145, 146, 150, 159, 160, 163, 278, 279, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753 and 767, Seksyen 10, Georgetown, DTL, Jalan Dato Keramat, Pulau Pinang	No major condition is attached.	Not applicable
8.	2 nd Extension planning approval - Phase 4 (No. JPB/PM/4585PT.2 EXT.2)	MPPP	21.02.2010/ (a)20.02.2011	^(b) Lots 73, 96, 98, 101, 102, 145, 146, 150, 159, 160, 163, 278, 279, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753 and 767, Seksyen 10, Georgetown, DTL, Jalan Dato Keramat, Pulau Pinang	No major condition is attached.	Not applicable
9.	Planning approval - Phase 2 and Phase 3 (No. JPB/PM/4585 P.T.3)	MPPP	21.02.2008/ (a)20.02.2009 (refer to item (10) below)	^(b) Lots 73, 96, 98, 101, 102, 145, 146, 150, 159, 160, 163, 278, 279, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753 and 767, Seksyen 10, Georgetown, DTL, Jalan Dato Keramat, Pulau Pinang	No major condition is attached.	Not applicable
10.	1 st Extension planning approval - Phase 2 and Phase 3 (No. JPB/PM/4585 PT 3 EXT.1)	MPPP	21.02.2009/ (a)20.02.2010	^(b) Lots 73, 96, 98, 101, 102, 145, 146, 150, 159, 160, 163, 278, 279, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753 and 767, Seksyen 10, Georgetown, DTL, Jalan Dato Keramat, Pulau Pinang	No major condition is attached.	Not applicable
11.	Planning approval - Phase 1 and Phase 3 (No. MPPP/OSC/PM(279)/08)	MPPP	02.04.2009/ (a)01.04.2010	^(b) Lots 73, 96, 98, 101, 102, 145, 146, 150, 159, 160, 163, 278, 279, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753 and 767, Seksyen 10, Georgetown, DTL, Jalan Dato Keramat, Pulau Pinang	No major condition is attached.	Not applicable
12.	Building approval - Phase 2 and Phase 3 (No. B.P. No. 43652)	MPPP	24.05.2007/ (a)23.05.2008	^(b) Lots 73, 163, 101 and 743, and 742, 744, 745, 746, 747, 748, 749, 750, 278, 279, 102, 145, 146, 150 and 159, Seksyen 10, Georgetown, DTL, Jalan Dato Keramat, Pulau Pinang	No major condition is attached.	Not applicable

4. INFORMATION ON OUR GROUP (Cont'd)

No.	Type of Approval	Authority	Effective Date/ Date of Expiry	Locations of Assets	Major Conditions	Compliance Status
13.	Building approval - Phase 2 (No. B.P. No. 44196)	MPPP	07.12.2006/ (e)/(e)06.12.2007	^(b) Lots 73, 96, 98, 101, 102, 145, 146, 150, 159, 160, 163, 278, 279, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753 and 767, Seksyen 10, Georgetown, DTL, Jalan Dato Keramat, Pulau Pinang	No major condition is attached	Not applicable
14.	Building approval - Phase 2 (No. MPPP/OSC/PB(1265)/08)	MPPP	09.07.2009/ (e)/(e)08.07.2010	^(b) Lots 73, 96, 98, 101, 102, 145, 146, 150, 159, 160, 163, 278, 279, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753 and 767, Seksyen 10, Georgetown, DTL, Jalan Dato Keramat, Pulau Pinang	No major condition is attached	Not applicable
15.	Building approval - Phase 4 (33KV TNB sub-station) (No. MPPP/OSC/PB(1382)/09)	MPPP	20.10.2009/ (e)/(e)19.10.2010	^(b) Lots 73, 96, 98, 101, 102, 145, 146, 150, 159, 160, 163, 278, 279, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753 and 767, Seksyen 10, Georgetown, DTL, Jalan Dato Keramat, Pulau Pinang	No major condition is attached	Not applicable
16.	Commencement of work - Phase 2 (No. PB No. 43652)	MPPP	11.07.2007/ Not applicable	^(b) Lots 742, 744, 745, 746, 747, 748, 749, 750, 278, 279, 102, 145, 146, 150, 159 and part of 73, 163, 101 and 743, Seksyen 10, Georgetown, DTL, Jalan Dato Keramat, Pulau Pinang	No major condition is attached	Not applicable
17.	Commencement of work - Phase 2 (No. PB No. 44196)	MPPP	28.11.2007/ Not applicable	^(b) Lots 73, 96, 98, 101, 102, 145, 146, 150, 159, 160, 163, 278, 279, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753 and 767, Seksyen 10, Georgetown, DTL, Jalan Dato Keramat, Pulau Pinang	No major condition is attached	Not applicable
18.	Commencement of work - Phase 2 (No. MPPP/OSC/PB(1265)/08)	MPPP	29.12.2009/ Not applicable	^(b) Lots 73, 96, 98, 101, 102, 145, 146, 150, 159, 160, 163, 278, 279, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753 and 767, Seksyen 10, Georgetown, DTL, Jalan Dato Keramat, Pulau Pinang	No major condition is attached	Not applicable
19.	Surrender and realienation approval (No. (16)dlm.PTTL/S/RE/A/65)	PTG	15.05.2009/ Not applicable	^(b) Lots 73, 96, 98, 101, 102, 145, 146, 150, 159, 160, 163, 278, 279, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753 and 767, Seksyen 10, Georgetown, DTL, Jalan Dato Keramat, Pulau Pinang	No major condition is attached	Not applicable

4. INFORMATION ON OUR GROUP (Cont'd)

Notes:-

- (a) The planning approval will not expire on the stipulated date as our Group has obtained the building approval(s) and/or commencement of work approval(s), where applicable.
- (b) The Lot Nos. 73, 96, 98, 101, 102, 145, 146, 150, 159, 160, 163, 278, 279, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 766 and 767 have been surrendered and realienated into a Lot No. PT 25 with the Grant No. H.S.(D) 16561 registered and issued on 15 August 2009.
- (c) The building approval expired/ will expire on this date unless the development work was/ is carried out on the site with the approval of MPPP.
- (d) IGSB commenced development work on 11 July 2007 which is as per the letter of approval for commencement of work issued by MPPP dated 11 July 2007, i.e. Commencement of work approval No. PB No. 43652 as disclosed in Section 4.14.1(iii), Penang Times Square, item no. (16).
- (e) IGSB commenced development work on 28 November 2007 which is as per the letter of approval for commencement of work issued by MPPP dated 28 November 2007, i.e. Commencement of work approval No. PB No. 44196 as disclosed in Section 4.14.1(iii), Penang Times Square, item no. (17).
- (f) IGSB commenced development work on 29 December 2009 which is as per the letter of approval for commencement of work issued by MPPP dated 29 December 2009, i.e. Commencement of work approval No. MPPP/OSC/PB(1265)/08 as disclosed in Section 4.14.1(iii), Penang Times Square, item no. (18).

4.14.2 Major Approvals Under the Possession of Our Associated Companies

Major approvals under the possession of our associated companies are as follows:-

(i) ICSB

No.	Type of Approval	Authority	Effective Date/ Date of Expiry	Locations of Assets	Major Conditions	Compliance Status
1.	Island Resort Planning approval - Phase 1 (No. JPB/PM/4411(LB))	MPPP	25.05.2006/ (a)24.05.2007	Lots 342, Seksyen 2, Bandar Batu Feringghi, DTL, Pulau Pinang	No major condition is attached.	Not applicable
2.	Planning approval (amended title) - Phase 1 (No. JPB/PM/4411(LB))	MPPP	20.07.2006/ (a)24.05.2007	Lots 342, Seksyen 2, Bandar Batu Feringghi, DTL, Pulau Pinang	No major condition is attached.	Not applicable
3.	Planning approval - Phase 1, Phase 2 and Phase 3 (No. JPB/PM/4426(LB) Pin.1)	MPPP	05.10.2006/ (a)04.10.2007 (refer to item (4) below)	Lots 342, 346, 347, 348, 349, 350, 351 and 353, Seksyen 2, Bandar Batu Feringghi, DTL, Pulau Pinang	No major condition is attached.	Not applicable
4.	1 st Extension planning approval - Phase 1, Phase 2 and Phase 3 (No. JPB/PM/4426(LB) Pin.1 Ext.1)	MPPP	05.10.2007/ (a)04.10.2008	Lots 342, 346, 347, 348, 349, 350, 351 and 353, Seksyen 2, Bandar Batu Feringghi, DTL, Pulau Pinang	No major condition is attached.	Not applicable

4. INFORMATION ON OUR GROUP (Cont'd)

No.	Type of Approval	Authority	Effective Date/ Date of Expiry	Locations of Assets	Major Conditions	Compliance Status
5.	Amended planning approval - Phase 1, Phase 2 and Phase 3 (No. MPPP/OSC/PM(326)/08(LB))	MPPP	06.04.2010/ (b)05.04.2011	Lots 342, 346, 347, 348, 349, 350, 351 and 353, Seksyen 2, Bandar Batu Feringghi, DTL, Pulau Pinang	No major condition is attached.	Not applicable
6.	Building approval - Phase 1 (No. B.P No. 44022(LB))	MPPP	28.11.2006/ (b)27.11.2007	Part of Lot 342, Seksyen 2, Bandar Batu Feringghi, DTL, Pulau Pinang	No major condition is attached.	Not applicable
7.	Building approval - Phase 1, Phase 2 and Phase 3 (No. B.P.44159(LB))	MPPP	09.04.2007/ (b)08.04.2008	Lots 342, 346, 347, 348, 349, 350, 351 and 353, Seksyen 2, Bandar Batu Feringghi, DTL, Pulau Pinang	No major condition is attached.	Not applicable
8.	Commencement of work - Phase 1 (No. PB No. 44022(LB))	MPPP	04.05.2007/ Not applicable	Part of Lot 342, Seksyen 2, Bandar Batu Feringghi, DTL, Pulau Pinang	No major condition is attached	Not applicable
9.	Commencement of work - Phase 1, Phase 2 and Phase 3 (No. PB No. 44159(LB))	MPPP	26.03.2008/ Not applicable	Lots 342, 346, 347, 348, 349, 350, 351 and 353, Seksyen 2, Bandar Batu Feringghi, DTL, Pulau Pinang	No major condition is attached	Not applicable
10.	Planning approval (amalgamation of Lots at council level) (No. JPB/SD/888)	MPPP	22.03.2007/ Not applicable	Lots 346, 347, 348 and 349 and 342, 350, 351 and 353, Seksyen 2, Bandar Batu Feringghi, DTL, Pulau Pinang	No major condition is attached.	Not applicable
11.	Geotechnical approval (No. PKR.PP.(112)/R/30/80/1 Jid.16(Y))	Jabatan Kerja Raya	28.02.2006/ Not applicable	Lots 342, 346, 347, 348, 349, 350, 351 and 353, Seksyen 2, Bandar Batu Feringghi, DTL, Pulau Pinang	No major condition is attached	Not applicable
12.	Clearance letter for Environment Impact Assessment (No. AS(B)P50/011/100/523)	Jabatan Alam Sekitar	25.01.2006/ Not applicable	Lots 342, 346, 347, 348, 349, 350, 351 and 353, Seksyen 2, Bandar Batu Feringghi, DTL, Pulau Pinang	No major condition is attached	Not applicable

Notes:-

- (a) The planning approval will not expire on the stipulated date as our Group has obtained the building approval(s) and/or commencement of work approval(s), where applicable.
- (b) The building approval expired/ will expire on this date unless the development work was/ is carried out on the site with the approval of MPPP.
- (c) ICSB commenced development work on 4 May 2007 which is as per the letter of approval for commencement of work issued by MPPP dated 4 May 2007, i.e. Commencement of work approval No. PB No. 44022(LB) as disclosed in Section 4.14.2(i), Island Resort, item no. (7).
- (d) ICSB commenced development work on 26 March 2008 which is as per the letter of approval for commencement of work issued by MPPP dated 26 March 2008, i.e. Commencement of work approval No. PB No. 44159(LB) as disclosed in Section 4.14.2(i), Island Resort, item no. (8).

4. INFORMATION ON OUR GROUP (Cont'd)

(ii) IVSB

No.	Type of Approval	Authority	Effective Date/ Date of Expiry	Locations of Assets	Major Conditions	Compliance Status
	Mount Erskine Development					
1.	Planning approval (No. MPPP/OSC/PM(16)/07(LB))	MPPP	21.02.2008/ ^(a) 20.02.2009 (refer to item (2) below)	Lot 141, Lebu Raya Halia, MK. 18, D.T.L, Pulau Pinang	No major condition is attached.	Not applicable
2.	1 st Extension planning approval (No. MPPP/OSC/PM(16)/07(LB) EXT.1)	MPPP	21.02.2009/ ^(a) 20.02.2010 (refer to item (3) below)	Lot 141, Lebu Raya Halia, MK. 18, D.T.L, Pulau Pinang	No major condition is attached.	Not applicable
3.	2 nd Extension planning approval (No. MPPP/OSC/PM(16)/07(LB) Ext.2)	MPPP	21.02.2010/ ^(a) 20.02.2011	Lot 141, Lebu Raya Halia, MK. 18, D.T.L, Pulau Pinang	No major condition is attached.	Not applicable
4.	Building approval (No. MPPP/OSC/PB(601)/08(LB))	MPPP	05.02.2009/ ^(a) 04.02.2010 (refer to item (5) below)	Lot 141, Lebu Raya Halia, MK. 18, D.T.L, Pulau Pinang	No major condition is attached.	Not applicable
5.	1 st Renewal building approval (No. MPPP/OSC/PB(601)/08(LB))	MPPP	21.04.2010/ ^(a) 20.04.2011	Lot 141, Lebu Raya Halia, MK. 18, D.T.L, Pulau Pinang	No major condition is attached.	Not applicable
6.	Earthwork plan approval (No. JK(J)/OSCIKT(367)/10(LB))	MPPP	05.05.2010/ Not applicable	Lot 141, Lebu Raya Halia, MK. 18, D.T.L, Pulau Pinang	No major condition is attached.	Not applicable
7.	Geotechnical approval (No. PKR.PP(16)R/30/60/1jld.23)	MPPP	19.11.2009/ Not applicable	Lot 141, Lebu Raya Halia, MK. 18, D.T.L, Pulau Pinang	No major condition is attached.	Not applicable
	Zen @ The View					
1.	Planning Approval (No. JPB/ PM/ 3874 (LB))	MPPP	22.12.2004/ ^(a) 21.12.2005	Lots 3319, 3320, 3321, 3322, 3329, 3330, 4681, 4683, and 4684, MK 13, D.T.L., Jalan Sultan Azlan Shah, Pulau Pinang.	No major condition is attached	Not applicable
2.	Building Approval (No. B.P No.41354 (LB))	MPPP	08.06.2005/ ^(a) 07.06.2006	Lots 3319, 3320, 3321, 3322, 3329, 3330, 4681, 4683, and 4684, MK 13, D.T.L., Jalan Sultan Azlan Shah, Pulau Pinang.	No major condition is attached	Not applicable
3.	Commencement of Work (No. PB No. 41354(LB))	MPPP	23.06.2005/ Not applicable	Lots 3319, 3320, 3321, 3322, 3329, 3330, 4681, 4683, and 4684, MK 13, D.T.L., Jalan Sultan Azlan Shah, Pulau Pinang.	No major condition is attached	Not applicable

4. INFORMATION ON OUR GROUP (Cont'd)

Notes:-

- (a) The planning approval will not expire on the stipulated date as our Group has obtained the building approval(s) and/or commencement of work approval(s), where applicable.
- (b) The building approval expired/ will expire on this date unless the development work was/ is carried out on the site with the approval of MPPP.
- (c) IVSB commenced development work on 23 June 2005 which is as per the letter of approval for commencement of work issued by MPPP dated 23 June 2005, i.e. Commencement of work approval No. PB No. 41354(LB) as disclosed in Section 4.14.2(ii), Zen @ The View, item no. (3).

4.14.3 Major Licences and Permits Under the Possession of Our Group

Major licences and permits under the possession of our Group are as follows:-

(i) IASB

No.	Type of Licence	Authority	Effective Date/ Date of Expiry	Major Conditions	Compliance Status
1.	Certificate of Registration for G7 (No expressed limit as to tendering capacity)	CIDB	31.05.2009/ 30.05.2012	No condition is attached.	Not applicable
2.	License under the Service Tax Act, 1975	Royal Customs and Excise Malaysia	06.11.2009/ Not applicable	No condition is attached.	Not applicable

(ii) IMSB

No.	Type of Licence	Authority	Effective Date/ Date of Expiry	Major Conditions	Compliance Status
1.	Housing Developer Licence	Kementerian Perumahan Dan Kerajaan Tempatan	25.10.2005/ 24.10.2010	No condition is attached.	Not applicable
2.	Advertisement and Sales Permit	Kementerian Perumahan Dan Kerajaan Tempatan	25.10.2009/ 24.10.2010	No condition is attached.	Not applicable

(iii) ICSB

No.	Type of Licence	Authority	Effective Date/ Date of Expiry	Major Conditions	Compliance Status
1.	Housing Developer Licence	Kementerian Perumahan Dan Kerajaan Tempatan	18.04.2008/ 17.04.2013	No condition is attached.	Not applicable
2.	Advertisement and Sales Permit	Kementerian Perumahan Dan Kerajaan Tempatan	29.05.2010/ 28.05.2011	No condition is attached.	Not applicable

4. INFORMATION ON OUR GROUP (Cont'd)**(iv) IVSB**

No.	Type of Licence	Authority	Effective Date/ Date of Expiry	Major Conditions	Compliance Status
1.	Housing Developer Licence	Kementerian Perumahan Dan Kerajaan Tempatan	06.02.2009/ 05.02.2014	No condition is attached.	Not applicable
2.	Advertisement and Sales Permit	Kementerian Perumahan Dan Kerajaan Tempatan	25.05.2010/ 24.05.2011	No condition is attached.	Not applicable

(v) G&A

No.	Type of Licence	Authority	Effective Date/ Date of Expiry	Major Conditions	Compliance Status
1.	Licence under the Service Tax Act, 1975	Royal Customs and Excise Malaysia	02.08.2002/ Not applicable	No condition is attached.	Not applicable

(vi) IGSB

No.	Type of Licence	Authority	Effective Date/ Date of Expiry	Major Conditions	Compliance Status
1.	Public Performance Licence	Public Performance Malaysia Sdn Bhd	01.01.2010/ 31.12.2010	No condition is attached.	Not applicable
2.	Licence under the Service Tax Act, 1975	Royal Customs and Excise Malaysia	16.12.2009/ Not applicable	No condition is attached.	Not applicable

4.15 REGULATORY REQUIREMENTS AND ENVIRONMENTAL ISSUE

Our Group believes that we are in compliance in respect to all material regulatory requirements and environmental issues which may materially affect our Group's operations and/or utilisation of assets. As at LPD, our Group is not aware of any environmental proceedings or investigations to which we are or might become a party to.

4.16 DEPENDENCY ON CONTRACTS/ ARRANGEMENTS/ LICENCES

Save as disclosed in Section 4.14 of this Prospectus, our Board is of the opinion that our Group is not highly dependent on any single contract/ arrangement/ licence.

4.17 INTERRUPTIONS IN BUSINESS OPERATIONS

Our Group did not experience any interruption in our Group's business which had a significant effect on our operations during the past twelve (12) months prior to the date of this Prospectus.

4. INFORMATION ON OUR GROUP (Cont'd)

4.18 INDUSTRY OVERVIEW**4.18.1 Overview of the Malaysian Economy**

Malaysia being an open economy is adversely affected with exports contracting sharply, following the global financial crisis and economic downturn. The significant decline in exports in turn affected domestic demand. Consequently, economic growth contracted 6.2% in the first quarter of 2009. However, the GDP recorded a smaller decline of 3.9% in the second quarter, aided by speedy and effective implementation of stimulus packages as well as monetary easing. Economic performance is expected to improve in the second half of the year supported by counter-cyclical measures and reinforced by stabilisation in the global economic environment. As such, the economy is expected to turn around in the fourth quarter of 2009, though for the year it is estimated to contract 3.0%.

(Source: *Economic Report 2009/2010*)

The Malaysian economy registered a positive growth of 4.5% in the fourth quarter (3Q09: -1.2%), amid strengthened domestic and external demand. Sustained growth in private consumption and increased public sector spending contributed to higher domestic demand. The implementation of the fiscal stimulus measures had gained further momentum during the quarter, providing an additional impetus to growth. Meanwhile, Malaysia's export performance benefited from improvements in external demand, particularly from the regional economies, and from stronger commodity prices. On the supply side, all economic sectors recorded positive growth, with the exception of the mining sector. For the year as a whole, the Malaysian economy contracted by 1.7% (2008: +4.6%).

During the quarter, domestic demand increased by 3% (3Q09: 0.4%) following sustained growth in private consumption and higher public sector spending. Private consumption spending, which expanded by 1.7% (3Q 09: 1.5%), was supported by better conditions in the labour market, a low level of inflation and higher spending for the year-end festive season amid improved consumer sentiments. The public sector continued to provide impetus to growth, with public consumption expanding by 1.3% supported by the expenditure on emoluments and supplies and services. Following accelerated implementation of the stimulus measures during the quarter, public sector capital expenditure also increased further. The bulk of the development expenditure was channelled into the trade and industry, public utilities, education and transportation sectors. Although private capital spending remained weak, there were signs of stabilisation as business sentiment continued to improve. As a result, gross fixed capital formation turned around to register a positive growth of 8.2% during the quarter (3Q09: -7.9%).

(Source: *Bank Negara Malaysia Fourth Quarter 2009 Report*)