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Ashurst Australia  
Level 11  
5 Martin Place  
Sydney NSW 2000  
Australia

07 November 2019

GPO Box 9938  
Sydney NSW 2001  
Australia

**BY EMAIL**

Tel +61 2 9258 6000  
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DX 388 Sydney  
www.ashurst.com

Company Secretary  
Donaco International Limited  
c/o Lumina Chartered Accountants  
Level 18, 420 George Street  
Sydney NSW 2000  
Ben.reichel@donacointernational.com

**ashurst**

Dear Sir

**Donaco International Limited – Substantial Shareholding Notice**

Please find attached a substantial shareholding notice lodged on behalf of members of the Somboon family.

Yours faithfully



**Ashurst**

# Forms 603 and 604

Corporations Act 2001  
Section 671B

## Notice of interests of substantial holders

To Company Name/Scheme **Donaco International Limited**

ACN/ARSN **ACN 007 424 777**

### 1. Details of substantial holders (1)

Name **Mr. Bhuvassith Chairunroj (aka Lee Bug Tong)  
Mr. Techatut Sukcharoenkraisri (aka Lee Bug Huy)  
Mr. Somboon Sukcharoenkraisri (aka Lee Bug Leng)  
Highest Point Investments Limited**

ACN/ARSN (if applicable) **N/A**

The holders became substantial holders on 1 July 2015

Previous notices of initial substantial holder (Form 603) were given to the company on 10 July 2015 by each of Mr. Lee Bug Tong and Mr. Lee Bug Huy in relation to becoming a substantial shareholder on 1 July 2015. A previous notice Appendix 3Y was given to the company on 20 October 2016 by Mr. Lee Bug Huy in relation to a change in director's interest concerning shares acquired by Highest Point Investments Limited. A copy of those notices are attached.

This notice is intended to clarify and confirm the disclosures contained in the notices referred to above and in other disclosures made to ASX in connection with the interests of the substantial holders.

### 2. Present voting power

The total number of votes attached to all the voting shares in the company or voting interests in the scheme that the substantial holders or associates (2) has a relevant interest (3) are as follows:

Class of securities (4)	Number of securities	Person's votes (5)	Voting power (6)
Ordinary Shares	148,199,529	148,199,529	17.99% (based on 823,592,773 ordinary shares in issue)

### 3. Details of relevant interests

The nature of the relevant interest the substantial holders or associates have in the following voting securities are as follows:

Holder of relevant interest	Nature of relevant interest (7)	Class and number of securities
Mr. Bhuvassith Chairunroj (aka Lee Bug Tong)	In relation to 73,599,765 ordinary shares, relevant interest pursuant to section 608(1) of the Corporations Act. In relation to 1,000,000 ordinary shares, deemed relevant interest pursuant to section 608(3) of the Corporations Act.	74,599,765 ordinary shares
Mr. Techatut Sukcharoenkraisri (aka Lee Bug Huy)	In relation to 73,599,764 ordinary shares, relevant interest pursuant to section 608(1) of the Corporations Act. In relation to 1,000,000 ordinary shares, deemed relevant interest pursuant to section 608(3) of the Corporations Act.	74,599,764 ordinary shares
Mr Somboon Sukcharoenkraisri (aka Lee Bug Leng)	In relation to 1,000,000 ordinary shares, deemed relevant interest pursuant to section 608(3) of the Corporations Act.	1,000,000 ordinary shares
Highest Point Investments Limited	Relevant interest pursuant to section 608(1) of the Corporations Act.	1,000,000 ordinary shares

### 4. Details of registered holders

The persons registered as holders of the securities referred to in paragraph 3 above are as follows:

Holder of relevant interest	Registered holder of securities	Person entitled to be registered as holder (8)	Class and number of securities
Mr. Bhuvassith Chairunroj (aka Lee Bug Tong)	HSBC Custody Nominees (Australia) Limited	Mr. Bhuvassith Chairunroj (aka Lee Bug Tong)	73,599,765 ordinary shares
Mr. Techatut Sukcharoenkraisri (aka Lee Bug Huy)	HSBC Custody Nominees (Australia) Limited	Mr. Techatut Sukcharoenkraisri (aka Lee Bug Huy)	73,599,764 ordinary shares
Highest Point Investments Limited	HSBC Custody Nominees (Australia) Limited	Highest Point Investments Limited	1,000,000 ordinary shares

### 5. Consideration

The consideration paid for each relevant interest referred to in paragraph 3 above is as follows:

Holder of relevant interest	Date of acquisition	Consideration (9)		Class and number of securities
		Cash	Non-cash	
Mr. Bhuvassith Chairunroj (aka Lee Bug Tong)	1 July 2015		Pursuant to nomination made under a Restated Share Sale Agreement dated 18 June 2015.	73,599,765 ordinary shares
Mr. Techatut Sukcharoenkraisri (aka Lee Bug Huy)	1 July 2015		Pursuant to nomination made under a Restated Share Sale Agreement dated 18 June 2015.	73,599,764 ordinary shares
Highest Point Investments Limited	12 and 13 October 2016		On market share purchases for total consideration of \$420,000.	1,000,000 ordinary shares

## 6. Associates

The reasons the persons named in paragraph 3 above are associates of the substantial holder are as follows:

Name and ACN/ARSN (if applicable)	Nature of association
Mr. Bhuvassith Chairunroj (aka Lee Bug Tong)	By virtue of section 12(2)(b) of the Corporations Act. For the avoidance of doubt, Mr. Lee Bug Tong has no relevant interest in the 73,599,764 ordinary shares in which Mr. Lee Bug Huy has a relevant interest in referred to in paragraph 3 above.
Mr. Techatut Sukcharoenkraisri (aka Lee Bug Huy)	By virtue of section 12(2)(b) of the Corporations Act. For the avoidance of doubt, Mr. Lee Bug Huy has no relevant interest in the 73,599,765 ordinary shares in which Mr. Lee Bug Tong has a relevant interest in referred to in paragraph 3 above.
Mr Somboon Sukcharoenkraisri (aka Lee Bug Leng)	By virtue of section 12(2)(b) of the Corporations Act. The relevant interest of Mr. Lee Bug Leng in the company is limited to the 1,000,000 ordinary shares as referred to in paragraph 3 above and Mr Lee Bug Leng does not directly hold any shares in the company. For the avoidance of doubt, Mr. Lee Bug Leng has no relevant interest in the 73,599,765 ordinary shares in which Mr. Lee Bug Tong has a relevant interest in referred to in paragraph 3 above or the 73,599,764 ordinary shares in which Mr. Lee Bug Huy has a relevant interest in referred to in paragraph 3 above.
Highest Point Investments Limited	By virtue of section 12(2)(b) of the Corporations Act. For the avoidance of doubt, Highest Point Investments Limited has no relevant interest in the 73,599,765 ordinary shares in which Mr. Lee Bug Tong has a relevant interest in referred to in paragraph 3 above or the 73,599,764 ordinary shares in which Mr. Lee Bug Huy has a relevant interest in referred to in paragraph 3 above

## 7. Addresses

The addresses of persons named in this form are as follows:

Name	Address
Mr. Bhuvasith Chairunroj (aka Lee Bug Tong)	149, 9 <sup>th</sup> Floor, Room 9/2, Nonsi Road, Chong Nonsi, Yanawa, Bangkok 10120, THAILAND
Mr. Techatut Sukcharoenkraisri (aka Lee Bug Huy)	149, 9 <sup>th</sup> Floor, Room 9/2, Nonsi Road, Chong Nonsi, Yanawa, Bangkok 10120, THAILAND
Mr. Somboon Sukcharoenkraisri (aka Lee Bug Leng)	149, 9 <sup>th</sup> Floor, Room 9/2, Nonsi Road, Chong Nonsi, Yanawa, Bangkok 10120, THAILAND
Highest Point Investments Ltd	PO Box 957, Offshore Incorporation Centre, Road Town, Tortola, British Virgin Islands

## Signature

print name \_\_\_\_\_ capacity Authorized Signatory

sign here \_\_\_\_\_



date

7 November/2019

(Mr. Lee Bug Huy)

### DIRECTIONS

- (1) If there are a number of substantial holders with similar or related relevant interests (eg. a corporation and its related corporations, or the manager and trustee of an equity trust), the names could be included in an annexure to the form. If the relevant interests of a group of persons are essentially similar, they may be referred to throughout the form as a specifically named group if the membership of each group, with the names and addresses of members is clearly set out in paragraph 7 of the form.
- (2) See the definition of "associate" in section 9 of the Corporations Act 2001.
- (3) See the definition of "relevant interest" in sections 608 and 671B(7) of the Corporations Act 2001.
- (4) The voting shares of a company constitute one class unless divided into separate classes.
- (5) The total number of votes attached to all the voting shares in the company or voting interests in the scheme (if any) that the person or an associate has a relevant interest in.
- (6) The person's votes divided by the total votes in the body corporate or scheme multiplied by 100.
- (7) Include details of:
  - (a) any relevant agreement or other circumstances by which the relevant interest was acquired. If subsection 671B(4) applies, a copy of any document setting out the terms of any relevant agreement, and a statement by the person giving full and accurate details of any contract, scheme or arrangement, must accompany this form, together with a written statement certifying this contract, scheme or arrangement; and
  - (b) any qualification of the power of a person to exercise, control the exercise of, or influence the exercise of, the voting powers or disposal of the securities to which the relevant interest relates (indicating clearly the particular securities to which the qualification applies).See the definition of "relevant agreement" in section 9 of the Corporations Act 2001.
- (8) If the substantial holder is unable to determine the identity of the person (eg. if the relevant interest arises because of an option) write "unknown."
- (9) Details of the consideration must include any and all benefits, moneys and other, that any person from whom a relevant interest was acquired has, or may, become entitled to receive in relation to that acquisition. Details must be included even if the benefit is conditional on the happening or not of a contingency. Details must be included of any benefit paid on behalf of the substantial holder or its associate in relation to the acquisitions, even if they are not paid directly to the person from whom the relevant interest was acquired.

## Form 603

Corporations Act 2001

Section 671B

## Notice of initial substantial holder

To: Company name/Scheme Donaco International Limited  
 ACN/ARSN 007 424 777

## 1. Details of substantial holder (1)

Name Lee Bug Tong  
 ACN (if applicable)

The holder became a substantial holder on 1 July 2015

## 2. Details of voting power

The total number of votes attached to all the voting shares in the company or voting interests in the scheme that the substantial holder or an associate (2) had a relevant interest (3) in on the date the substantial holder became a substantial holder are as follows:

Class of securities (4)	Number of securities	Persons' votes (5)	Voting power (6)
Ordinary shares	73,599,765	73,599,765	8.86% (based on 830,723,631 shares)

## 3. Details of relevant interests

The nature of the relevant interest the substantial holder or an associate had in the following voting securities on the date the substantial holder became a substantial holder are as follows:

Holder of relevant interest	Nature of relevant interest (7)	Class and number of securities
Lee Bug Tong	Relevant interest under subsection 608(1)(b) and 608(1)(c) of the Corporations Act 2001 (the Act)	73,599,765 ORD
Lee Bug Huy	Relevant interest under subsection 608(1)(b) and 608(1)(c) of the Act	73,599,764 ORD

## 4. Details of present registered holders

The persons registered as holders of the securities referred to in paragraph 3 above are as follows:

Holder of relevant interest	Registered holder of securities	Person entitled to be registered as holder (8)	Class and number of securities
Lee Bug Tong	Lee Bug Tong	Lee Bug Tong	73,599,765 ORD
Lee Bug Huy	Lee Bug Huy	Lee Bug Huy	73,599,764 ORD

## 5. Consideration

The consideration paid for each relevant interest referred to in paragraph 3 above, and acquired in the four months prior to the day that the substantial holder became a substantial holder is as follows:

Holder of relevant interest	Date of acquisition	Consideration (9)		Class and number of securities
		Cash	Non-cash	
Lee Bug Tong	1 July 2015	–	Issued as part payment for the acquisition of the business of Star Vegas Resort & Club	73,599,765 ORD
Lee Bug Huy	1 July 2015	–	Issued as part payment for the acquisition of the business of Star Vegas Resort & Club	73,599,764 ORD

**6. Associates**

The reasons the persons named in paragraph 3 above are associates of the substantial holder are as follows:

Name and ACN (if applicable)	Nature of association
Lee Bug Tong	Lee Bug Tong and Lee Bug Huy are associates of each other pursuant to subsection 12(2)(a) of the Act
Lee Bug Huy	Lee Bug Tong and Lee Bug Huy are associates of each other pursuant to subsection 12(2)(a) of the Act

**7. Addresses**

The addresses of the persons named in this form are as follows:

Name	Address
Lee Bug Tong	No. 192A, Street 388, Sangkat Toul Svay Prey, Khan Chamcamorn, Phnom Penh, Kingdom of Cambodia
Lee Bug Huy	No. 192A, Street 388, Sangkat Toul Svay Prey, Khan Chamcamorn, Phnom Penh, Kingdom of Cambodia

**Signature**

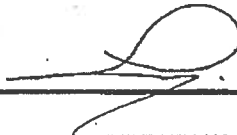
print name

Lee Bug Tong

Capacity

Registered Holder

sign here



date

10/7/15

**DIRECTIONS**

- (1) If there are a number of substantial holders with similar or related relevant interests (eg a corporation and its related corporations, or the manager and trustee of an equity trust), the names could be included in an annexure to the form. If the relevant interests of a group of persons are essentially similar, they may be referred to throughout the form as a specifically named group if the membership of each group, with the names and addresses of members is clearly set out in paragraph 7 of the form.
- (2) See the definition of "associate" in section 9 of the Corporations Act 2001.
- (3) See the definition of "relevant interest" in sections 608 and 671B(7) of the Corporations Act 2001.
- (4) The voting shares of a company constitute one class unless divided into separate classes.
- (5) The total number of votes attached to all the voting shares in the company or voting interests in the scheme (if any) that the person or an associate has a relevant interest in.
- (6) The person's votes divided by the total votes in the body corporate or scheme multiplied by 100.
- (7) Include details of:
  - (a) any relevant agreement or other circumstances by which the relevant interest was acquired. If subsection 671B(4) applies, a copy of any document setting out the terms of any relevant agreement, and a statement by the person giving full and accurate details of any contract, scheme or arrangements, must accompany this form, together with a written statement certifying this contract, scheme or arrangement; and
  - (b) any qualification of the power of a person to exercise, control the exercise of, or influence the exercise of, the voting powers or disposal of the securities to which the relevant interest relates (indicating clearly the particular securities to which the qualification applies).

See the definition of "relevant agreement" in section 9 of the Corporations Act 2001.
- (8) If the substantial holder is unable to determine the identity of the person (eg if the relevant interest arises because of an option) write "unknown".
- (9) Details of the consideration must include any and all benefits, money and other, that any person from whom a relevant interest was acquired has, or may, become entitled to receive in relation to that acquisition. Details must be included even if the benefit is conditional on the happening or not of a contingency. Details must be included of any benefit paid on behalf of the substantial holder or its associate in relation to the acquisitions, even if they are not paid directly to the person from whom the relevant interest was acquired.

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**Form 603**

Corporations Act 2001

Section 671B

**Notice of initial substantial holder**

To: Company name/Scheme Donaco International Limited  
 AGN/ARSN 007 424 777

**1. Details of substantial holder (1)**

Name Lee Bug Huy

ACN (if applicable)

The holder became a substantial holder on 1 July 2015

**2. Details of voting power**

The total number of votes attached to all the voting shares in the company or voting interests in the scheme that the substantial holder or an associate (2) had a relevant interest (3) in on the date the substantial holder became a substantial holder are as follows:

Class of securities (4)	Number of securities	Persons' votes (5)	Voting power (6)
Ordinary shares	73,599,764	73,599,764	8.86% (based on 830,723,631 shares)

**3. Details of relevant interests**

The nature of the relevant interest the substantial holder or an associate had in the following voting securities on the date the substantial holder became a substantial holder are as follows:

Holder of relevant interest	Nature of relevant interest (7)	Class and number of securities
Lee Bug Huy	Relevant interest under subsection 608(1)(b) and 608(1)(c) of the Corporations Act 2001 (the Act)	73,599,765 ORD
Lee Bug Tong	Relevant interest under subsection 608(1)(b) and 608(1)(c) of the Act	73,599,764 ORD

**4. Details of present registered holders**

The persons registered as holders of the securities referred to in paragraph 3 above are as follows:

Holder of relevant interest	Registered holder of securities	Person entitled to be registered as holder (8)	Class and number of securities
Lee Bug Huy	Lee Bug Huy	Lee Bug Huy	73,599,764 ORD
Lee Bug Tong	Lee Bug Tong	Lee Bug Tong	73,599,765 ORD

**5. Consideration**

The consideration paid for each relevant interest referred to in paragraph 3 above, and acquired in the four months prior to the day that the substantial holder became a substantial holder is as follows:

Holder of relevant interest	Date of acquisition	Consideration (9)		Class and number of securities
		Cash	Non-cash	
Lee Bug Huy	1 July 2015	–	Issued as part payment for the acquisition of the business of Star Vegas Resort & Club	73,599,764 ORD
Lee Bug Tong	1 July 2015	–	Issued as part payment for the acquisition of the business of Star Vegas Resort & Club	73,599,765 ORD



**6. Associates**

The reasons the persons named in paragraph 3 above are associates of the substantial holder are as follows:

Name and ACN (if applicable)	Nature of association
Lee Bug Huy	Lee Bug Tong and Lee Bug Huy are associates of each other pursuant to subsection 12(2)(a) of the Act
Lee Bug Tong	Lee Bug Tong and Lee Bug Huy are associates of each other pursuant to subsection 12(2)(a) of the Act

**7. Addresses**

The addresses of the persons named in this form are as follows:

Name	Address
Lee Bug Huy	No. 192A, Street 388, Sangkat Toul Svay Prey, Khan Chamcarom, Phnom Penh, Kingdom of Cambodia
Lee Bug Tong	No. 192A, Street 388, Sangkat Toul Svay Prey, Khan Chamcarom, Phnom Penh, Kingdom of Cambodia

**Signature**

print name

Lee Bug Huy

Capacity

Registered holder

sign here

Huy

date

10-01-2015

**DIRECTIONS**

- (1) If there are a number of substantial holders with similar or related relevant interests (eg a corporation and its related corporations, or the manager and trustee of an equity trust), the names must be included on an annexure to the form. If the relevant interests of a group of persons are substantially similar, they may be referred to throughout the form as a specifically named group if the memberships of each group, with the names and addresses of members is clearly set out in paragraph 7 of the form.
- (2) See the definition of "associate" in section 9 of the Corporations Act 2001.
- (3) See the definition of "relevant interest" in sections 616 and 617(1)(c) of the Corporations Act 2001.
- (4) The voting shares of a company constitute one class unless divided into separate classes.
- (5) The total number of votes attached to all the voting shares in the company or voting interests in the scheme (if any) that the person or an associate has a relevant interest in.
- (6) The person's votes divided by the total votes in the body corporate or scheme multiplied by 100.
- (7) Include details of:
  - (a) any relevant agreement or other circumstances by which the relevant interest was acquired. (Subsection 617(1)(d) applies, a copy of any document setting out the terms of any relevant agreement, and a statement by the person giving full and accurate details of any contract, scheme or arrangements, must accompany the form, together with a written statement certifying this contract, scheme or arrangement; and
  - (b) any qualification of the power of a person to exercise, control the exercise of, or influence the exercise of, the voting powers or disposal of the securities to which the relevant interest relates (indicating clearly the particular securities to which the qualification applies).
 See the definition of "relevant agreement" in section 9 of the Corporations Act 2001.
- (8) If the substantial holder is unable to determine the identity of the person (eg if the relevant interest arises because of an option) write "unknown".
- (9) Details of the consideration must include any and all benefits, money and other, that any person from whom a relevant interest was acquired has, or may, become entitled to receive in relation to that acquisition. Details must be included even if the benefit is conditional on the happening or non-occurrence of a contingency. Details must be included of any benefit paid on behalf of the substantial holder or its associate in relation to the acquisition, even if they are not paid directly to the person from whom the relevant interest was acquired.

## Appendix 3Y

### Change of Director's Interest Notice

Information or documents not available now must be given to ASX as soon as available. Information and documents given to ASX become ASX's property and may be made public.

Introduced 30/09/01 Amended 01/01/11

<b>Name of entity</b>	Donaco International Limited
<b>ABN</b>	28 007 424 777

We (the entity) give ASX the following information under listing rule 3.19A.2 and as agent for the director for the purposes of section 205G of the Corporations Act.

<b>Name of Director</b>	Ham Techatut Sukjaroenkaisri
<b>Date of last notice</b>	3 July 2015

#### Part 1 - Change of director's relevant interests in securities

*In the case of a trust, this includes interests in the trust made available by the responsible entity of the trust*

Note: In the case of a company, interests which come within paragraph (i) of the definition of "notifiable interest of a director" should be disclosed in this part.

<b>Direct or indirect interest</b>	Direct and Indirect
<b>Nature of indirect interest (including registered holder)</b> Note: Provide details of the circumstances giving rise to the relevant interest.	Indirect interests are held by Highest Point Investments Limited. Mr Sukjaroenkaisri is a beneficial owner of the company.
<b>Date of change</b>	12-13 October 2016
<b>No. of securities held prior to change</b>	Direct – 73,599,764 ordinary shares
<b>Class</b>	Fully paid ordinary shares
<b>Number acquired</b>	1,000,000 ordinary shares
<b>Number disposed</b>	Nil

+ See chapter 19 for defined terms.

Appendix 3Y  
Change of Director's Interest Notice

<b>Value/Consideration</b> Note: If consideration is non-cash, provide details and estimated valuation	\$420,000
<b>No. of securities held after change</b>	Direct – 73,599,764 ordinary shares Indirect – 1,000,000 ordinary shares
<b>Nature of change</b> Example: on-market trade, off-market trade, exercise of options, issue of securities under dividend reinvestment plan, participation in buy-back	On-market trade

**Part 2 – Change of director's interests in contracts**

Note: In the case of a company, interests which come within paragraph (ii) of the definition of "notifiable interest of a director" should be disclosed in this part.

<b>Detail of contract</b>	
<b>Nature of interest</b>	
<b>Name of registered holder (if issued securities)</b>	
<b>Date of change</b>	
<b>No. and class of securities to which interest related prior to change</b> Note: Details are only required for a contract in relation to which the interest has changed	
<b>Interest acquired</b>	
<b>Interest disposed</b>	
<b>Value/Consideration</b> Note: If consideration is non-cash, provide details and an estimated valuation	
<b>Interest after change</b>	

**Part 3 – <sup>+</sup>Closed period**

<b>Were the interests in the securities or contracts detailed above traded during a <sup>+</sup>closed period where prior written clearance was required?</b>	No
<b>If so, was prior written clearance provided to allow the trade to proceed during this period?</b>	N/A
<b>If prior written clearance was provided, on what date was this provided?</b>	N/A

<sup>+</sup> See chapter 19 for defined terms.

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