

**E-PAY ASIA LIMITED (“EPY”)
TOP TWENTY SHAREHOLDERS AND DISTRIBUTION SCHEDULE**

TOP TWENTY SHAREHOLDERS

<i>NAME OF HOLDER</i>	<i>NO. OF SHARES</i>	<i>%</i>
TOBIKIRI CAPITAL LIMITED	118,285,830	62.1
DATO' MD HASSAN SAID	14,000,000	7.4
CITIBANK PTY LIMITED	10,800,000	5.7
WONG YIN CHING	7,297,500	3.8
MR GERALD WILTON	5,742,857	3.0
HOODLESS BRENNAN & PARTNERS	5,000,000	2.6
MR ANTHONY JOHN HAMILTON	2,342,857	1.2
RAVEN NOMINEES LIMITED	1,553,454	0.8
PERSHING KEEN NOMINEES LIMITED	1,318,000	0.7
ALBY AUSTRALIA PTY LTD	1,175,655	0.6
CITICORP NOMINEES PTY LIMITED	1,126,639	0.6
MR WILLIAM GORDON MARTIN & MRS BEVERLEY MICHELLE MARTIN	1,000,000	0.5
MR DAVE GONZALEZ ESQUIRE	764,071	0.4
HORDERN PROPERTIES PTY LIMITED	714,286	0.4
MR ALAN WILLIAM MORGAN	763,892	0.4
CLEAR DATA VOICE PTE LTD	622,400	0.3
ZELCREST CAPITAL LIMITED	594,652	0.3
MR JONATHAN RICHARD DAVIE	514,631	0.3
MR BERNARD C GRIGSBY 2ND	500,000	0.3
BEIRNE TRADING PTY LTD	500,000	0.3
TOTAL NO. OF SHARES HELD BY TOP TWENTY	174,616,724	92
TOTAL NO. OF SHARES ON ISSUE	190,405,896	100

DISTRIBUTION SCHEDULE

	<i>Fully paid ordinary shares as at 28 December 2005</i>				
	<i>1 to 500</i>	<i>501 to 1000</i>	<i>1,001 to 10,000</i>	<i>10,001 to 50,000</i>	<i>50,001 and more</i>
No. of Holders	525	248	597	356	88