

IMPORTANT

THIS FORM IS VALUABLE BUT IS NOT TRANSFERABLE AND REQUIRES YOUR IMMEDIATE ATTENTION. THE OFFER CONTAINED IN THIS DOCUMENT AND THE ACCOMPANYING PROVISIONAL ALLOTMENT LETTER EXPIRES AT 4:30 P.M. ON THURSDAY, 19 NOVEMBER 2009.

If you are in any doubt as to any aspect of this form or as to the action to be taken, you should consult your licensed securities dealer, bank manager, solicitor, professional accountant or other professional adviser. A copy of this form together with the prospectus of First Pacific Company Limited (the "Company") dated Wednesday, 4 November 2009 (the "Prospectus") and the provisional allotment letter (together the "Prospectus Documents") to be issued in connection with the Rights Issue (as defined in the Prospectus) have been registered by the Registrar of Companies in Hong Kong as required by Section 342C of the Companies Ordinance, Chapter 32 of the Laws of Hong Kong and will be filed with the Registrar of Companies in Bermuda on or as soon as reasonably practicable after the publication of the Prospectus as required by the Companies Act 1981 of Bermuda. The Registrar of Companies in Hong Kong, the Registrar of Companies in Bermuda and the Securities and Futures Commission of Hong Kong take no responsibility for the contents of any of these documents. Dealings in the Shares (as defined in the Prospectus) and the Rights Shares in their nil-paid form and fully-paid form may be settled through the Central Clearing and Settlement System ("CCASS") operated by Hong Kong Securities Clearing Company Limited ("HKSCC") and you should consult your licensed securities dealer, bank manager, solicitor, professional accountant or other professional adviser for details of those settlement arrangements and how such arrangements may affect your rights and interests. Subject to the granting of the listing of, and permission to deal in, the Rights Shares in their nil-paid and fully-paid forms on The Stock Exchange of Hong Kong Limited (the "Stock Exchange") as well as compliance with the stock admission requirements of HKSCC, the Rights Shares in their nil-paid and fully-paid forms will be accepted as eligible securities by HKSCC for deposit, clearance and settlement in CCASS with effect from the respective commencement dates of dealings in the Rights Shares in their nil-paid and fully-paid forms or such other dates as determined by HKSCC. Settlement of transactions between participants of the Stock Exchange on any trading day is required to take place in CCASS on the second trading day thereafter. All activities under CCASS are subject to the General Rules of CCASS and CCASS Operational Procedures in effect from time to time. The Stock Exchange and HKSCC take no responsibility for the contents of this form, make no representation as to its accuracy or completeness and expressly disclaim any liability whatsoever for any loss howsoever arising from or in reliance upon the whole or any part of the contents of this form.

THIS FORM IS NOT FOR PUBLICATION, RELEASE OR DISTRIBUTION, DIRECTLY OR INDIRECTLY, IN OR INTO THE UNITED STATES.

FIRST
PACIFIC

FIRST PACIFIC COMPANY LIMITED

(Incorporated with limited liability under the laws of Bermuda)

Website: <http://www.firstpacific.com>

(Stock code: 00142)

PROPOSED RIGHTS ISSUE

643,387,400 RIGHTS SHARES

AT THE SUBSCRIPTION PRICE OF HK\$2.00 PER RIGHTS SHARE
ON THE BASIS OF ONE RIGHTS SHARE FOR EVERY FIVE EXISTING
SHARES HELD ON THE RECORD DATE
EXCESS APPLICATION FORM

Branch Share Registrar in Hong Kong:
Computershare Hong Kong Investor
Services Ltd.
Shops 1712-1716, 17/F, Hopewell Centre
183 Queen's Road East
Wan Chai, Hong Kong

Registered office:
Canon's Court
22 Victoria Street
Hamilton
HM12
Bermuda

Name(s) and address of Qualifying Shareholder(s)

Application to be made by the Qualifying
Shareholder(s) named above

Terms defined in the Prospectus have the same meaning unless the context indicates otherwise.

To: The Directors
First Pacific Company Limited

Dear Sirs,

I/We, being the registered holder(s) of the Shares, hereby irrevocably apply for _____ excess Rights Share(s) at the issue price of HK\$3.40 per Rights Share under the Rights Issue. In respect of _____, we enclose _____ remittance in favour of "First Pacific Company Limited – Excess Application Account" and crossed "Account Payee Only" is for HK\$_____. I/We hereby present in full on application for the aforementioned number of excess Rights Shares and I/we hereby request you to allot such excess Rights Shares (or, if less, a number of them) and to send by ordinary post at my/our risk to the address shown above my/our share certificate(s) for the number of additional Rights Shares which may be allotted to me/us in respect of this application and/or a cheque for any application money refundable to me/us. I/We understand that allotment in respect of this application shall be made in their discretion on a fair and equitable basis on the following principles: (1) preference will be given to applications for less than a board lot of Rights Shares where the Directors that such applications are made to round up odd lot holdings to whole lot holdings and that such applications are not made with the intention to abuse this principle; and (2) subject to the availability of excess Rights Shares under principle (1), the excess Rights Shares will be allocated based on a sliding scale with reference to the number of excess Rights Shares applied for by Qualifying Shareholders (i.e. Qualifying Shareholders applying for a smaller number of excess Rights Shares will be allocated a higher percentage of the excess Rights Shares they have applied for whereas Qualifying Shareholders applying for a larger number of Rights Shares will be allocated a lower percentage of the excess Rights Shares they have applied for (although they will receive a greater number of Rights Shares than those applying for a smaller number).

I/We, hereby undertake to accept such number of excess Rights Shares as may be allotted to me/us as aforesaid upon the terms set out in the Prospectus and subject to the Memorandum of Association and the Bye-laws of the Company. In respect of any excess Rights Shares allotted to me/us, I/we authorise you to place my/our name(s) on the register of members of the Company as holder(s) of such Rights Shares.

1. _____ 2. _____ 3. _____ 4. _____

Signature(s) of applicant(s) (all joint Shareholders must sign)

Date: _____ 2009

Contact Tel No: _____

PROCEDURE FOR ACCEPTANCE

This form should be completed and lodged, together with payment as to HK\$3.40 per Rights Share for the number of excess Rights Shares applied for, with the Company's branch share registrar, Computershare Hong Kong Investor Services Ltd., Shops 1712-1716, 17/F, Hopewell Centre, 183 Queen's Road East, Wan Chai, Hong Kong, so as to be received by not later than 4:30 p.m. on Thursday, 19 November 2009. All remittances must be made in Hong Kong dollars and must be forwarded either by cheque drawn on a Hong Kong dollar account with a licensed bank in Hong Kong or by a separate cashier's order issued by a licensed bank in Hong Kong. All such cheques or cashier's orders must be made payable to "First Pacific Company Limited – Excess Application Account" and crossed "Account Payee Only". All enquiries in connection with this form of application for excess Rights Shares should be addressed to the Company's branch share registrar at the above address.

All cheques and cashier's orders will be presented for payment immediately following receipt and all interest earned on such monies will be retained for the benefit of the Company. Completion and return of a form of application for excess Rights Shares together with a cheque or cashier's order in payment for the Rights Shares applied for which are the subject of this form will constitute a warranty by the applicant(s) that the cheque or cashier's order will be honoured on first presentation. Without prejudice to its other rights in respect thereof, the Company reserves the right to reject any application for excess Rights Shares in respect of which the accompanying cheque or cashier's order is dishonoured on first presentation.

DISTRIBUTION OF THIS EXCESS APPLICATION FORM AND THE OTHER PROSPECTUS DOCUMENTS

This excess application form shall only be sent to the Qualifying Shareholders.

Distribution of this excess application form and the other Prospectus Documents into jurisdictions other than Hong Kong may be restricted by law. Persons into whose possession this excess application form or any of the other Prospectus Documents come (including, without limitation, agents, custodians, nominees and trustees) should inform themselves of and observe any such restrictions. Any failure to comply with those restrictions may constitute a violation of the securities laws of any such jurisdiction. Any Shareholder or Beneficial Owner who is in any doubt as to his/her position should consult an appropriate professional adviser without delay. In particular, subject to certain exceptions as agreed between the Company and the Underwriters, this excess application form and the other Prospectus Documents should not be distributed, forwarded to or transmitted in, into or from any of the Specified Territories.

The Prospectus Documents will not be registered under the applicable securities legislation of any jurisdiction other than Hong Kong and Bermuda.

A SEPARATE CHEQUE OR CASHIER'S ORDER MUST ACCOMPANY EACH APPLICATION

NO RECEIPT WILL BE GIVEN

For office use only

Application number	No. of excess Rights Shares applied for	Amount paid on application	Balance refunded
		HK\$	HK\$

QUALIFYING SHAREHOLDERS AND NON-QUALIFYING SHAREHOLDERS

To qualify for the Rights Issue and to apply for excess Rights Shares under this excess application form, a Shareholder must have been registered as a member of the Company as at 5:00 p.m. on Wednesday, 4 November 2009 and not be a Non-Qualifying Shareholder.

The Non-Qualifying Shareholders are Shareholders resident in the US, the UK and Canada (the "Specified Territories"), except that a Shareholder resident in one of the Specified Territories who was registered as a member of the Company on the Record Date and who fulfils the requirements of an applicable exemption described in the section below headed "Limited categories of persons in the Specified Territories who may be able to take up their rights under the Rights Issue and apply for excess Rights Shares" is regarded as a Qualifying Shareholder.

Receipt of this excess application form and/or any other Prospectus Document does not and will not constitute an offer in those jurisdictions in which it would be illegal to make an offer and, in those circumstances, this excess application form and/or the other Prospectus Documents must be treated as sent for information only and should not be copied or redistributed. Persons (including, without limitation, custodians, nominees and trustees) who receive a copy of this excess application form and/or any other Prospectus Document should not, in connection with the Rights Issue, distribute or send the same in, into or from, or transfer nil-paid Rights Shares to any person in, into or from, any of the Specified Territories. If an excess application form is received by any person in any such territory, or by his/her agent or nominee, he/she must not seek to apply for any excess Rights Shares under the excess application form unless the Company and the Underwriters determine that such action would not violate applicable legal or regulatory requirements. Any person (including, without limitation, custodians, nominees and trustees) who does forward this excess application form or any other Prospectus Document in, into or from any Specified Territory (whether under a contractual or legal obligation or otherwise) should draw the recipient's attention to the contents of this section.

Notwithstanding any other provision in this excess application form or any other Prospectus Document, the Company and the Underwriters reserve the right to permit any Shareholder to apply for excess Rights Shares if the Company and the Underwriters, in their absolute discretion, are satisfied that the transaction in question would not result in a contravention of any registration or other legal requirement in any jurisdiction.

LIMITED CATEGORIES OF PERSONS IN THE SPECIFIED TERRITORIES WHO MAY BE ABLE TO TAKE UP THEIR RIGHTS UNDER THE RIGHTS ISSUE AND APPLY FOR EXCESS RIGHTS SHARES

The following limited categories of persons in the Specified Territories may be able to take up their rights under the Rights Issue and apply for excess Rights Shares:

- Shareholders and Beneficial Owners in the US whom the Company believes reasonably are QIBs (the identity of whom are to be agreed between the Company and the Underwriters) may be able to purchase Rights Shares being offered in the Rights Issue (pursuant to the exercise of rights granted under the Rights Issue) and apply for excess Rights Shares by way of a private placement pursuant to an applicable exemption from registration under the Securities Act, provided that they provide a signed investor representation letter in the form set out in Appendix IV of the Prospectus, which will also contain restrictions on the procedures regarding the transfer of Rights Shares, in accordance with the requirements of the Prospectus.
- Persons resident in the UK who are (a) persons who have professional experience in matters relating to investments and who are "professionals" as specified in Article 19(5) of the Financial Services and Markets Act 2000 (Financial Promotion) Order 2005 (the "Financial Promotion Order"); or (b) persons falling within Article 49(2)(a)-(d) of the Financial Promotion Order ("high net worth companies, unincorporated associations etc"); or (c) persons to whom the Prospectus may otherwise be lawfully distributed.
- Persons located in Canada who are "accredited investors" as defined in National Instrument 45-106 *Prospectus and Registration Requirements for Issuers* ("NI 45-106") or "permitted clients" as defined in National Instrument 31-103 *Registration Requirements and Exemptions* ("NI 31-103").

In each case, the Company and the Underwriters reserve the absolute discretion in determining whether to accept any participation and applications for excess Rights Shares, as well as the identity of the persons who may be allowed to do so.

REPRESENTATIONS AND WARRANTIES

By completing, signing and submitting this excess application form, each holder of Rights Shares who is domiciled outside the US hereby represents and warrants to the Company and the Underwriters and to any person acting on their behalf, in their sole discretion, that the Company and the Underwriters waive such requirement that:

- He/she/it was a Shareholder as at 5:00 p.m. on Wednesday, 4 November 2009, or he/she/it lawfully owned or may lawfully acquire rights, directly or indirectly, from such a person;
- He/she/it may lawfully be offered, take up, exercise, or subscribe for and exercise the rights and/or the Rights Shares in the jurisdiction in which he/she/it resides or is currently located;
- Subject to certain exceptions, he/she/it is not a resident or domiciled in, or a citizen of, the US;
- Subject to certain exceptions, he/she/it is not making an offer to acquire, take up or exercise rights or Rights Shares on a nondiscretionary basis for a person who is resident or located in, or a citizen of the US at the time the application to accept was given;
- He/she/it is acquiring the rights and/or Rights Shares in an "offshore transaction" as defined in Regulation S under the Securities Act;
- He/she/it has not been offered the Rights Shares by means of any "directed sales efforts" as defined in Regulation S under the Securities Act;
- He/she/it is not acquiring the Rights Shares with a view to the offer, sale, transfer, delivery or distribution, directly or indirectly, of such rights or Rights Shares into the US; and
- He/she/it understands that neither the rights nor the Rights Shares have been or will be registered under the Securities Act or with any securities regulatory authority of any state, territory, or possession of the US. The rights or Rights Shares are being distributed and offered outside the US in reliance on Regulation S. Consequently he/she/it understands the rights or Rights Shares may not be offered, sold, or transferred into or into the US, except in reliance on an exemption from, or in transactions not subject to, the registration requirements of the Securities Act.

Any person applying for excess Rights Shares under this excess application form represents and warrants to the Company and the Underwriters that, except where proof or confirmation has been provided to the Company's satisfaction, the person's use of this excess application form will not result in the contravention of any applicable legal requirement in any jurisdiction: (i) such person is not applying for excess Rights Shares from within any of the Specified Territories; (ii) such person is not in any of the Specified Territories or in any territory in which it is otherwise unlawful to apply for excess Rights Shares, or to make or accept an offer to acquire the Rights Shares, or to use this excess application form in any manner in which such person has used or will use it; (iii) such person is not acting on a non-discretionary basis for a person resident in any of the Specified Territories at the time the instruction to apply for excess rights was given; and (iv) such person is not acquiring the Rights Shares with a view to the offer, sale, resale, transfer, delivery or distribution, directly or indirectly, of any of the Rights Shares into any of the Specified Territories.

The Company may treat as invalid any application for excess Rights Shares comprised in this excess application form, if it: (a) appears to the Company to have been executed in, or despatched from, any of the Specified Territories and the acceptance may involve a breach of the laws of the relevant Specified Territory or the application is otherwise in a manner which may involve a breach of the laws of any jurisdiction or if it or its agents believe the same may violate any applicable legal or regulatory requirement; (b) provides an address in any of the Specified Territories for delivery of definitive share certificates for Rights Shares and such delivery would be unlawful or provides an address for delivery of definitive share certificates in any other jurisdiction outside Hong Kong in which it would be unlawful to deliver such certificates; or (c) purports to exclude the representation and/or warranty required by the paragraph immediately above.

In relation to the Canadian investors, capitalised terms and expressions shall have the respective meanings assigned to them in the Canadian Offering Memorandum dated on or around Wednesday, 4 November 2009 issued by the Company in connection with the Rights Issue (the "Canadian Offering Memorandum"). By completing, signing and submitting this excess application form, each Canadian investor who exercises the Rights and subscribes for the Shares will be deemed to have represented to the Company, each of the Underwriters, their respective broker-dealer affiliates and each dealer participating in the distribution of the Rights and Shares as set forth in the Canadian offering Memorandum.

Completion and return of a form of application for excess Rights Shares by any person will constitute a warranty and representation to the Company, by such person, that all registration, legal and regulatory requirements, in connection with such application have been or will be duly complied with by that person.

GENERAL

You will be notified by the Company of any allotment of excess Rights Shares made to you. If no excess Rights Shares are allotted to you, a refund cheque for the full amount tendered on application will be posted to you at your own risk and, if the number of excess Rights Shares allotted to you is less than the number applied for, a cheque for the surplus application monies will be posted to you at your own risk. Such posting is expected to take place on or before Friday, 27 November 2009. Any such cheque will be drawn in favour of the person(s) named on this form. It is expected that share certificates in respect of the Rights Shares will be posted at your own risk on or before Friday, 27 November 2009.

All documents, including cheques for amounts due, will be sent by ordinary post at the risk of the relevant applicants or other persons entitled thereto.

This excess application form and all applications pursuant to it shall be governed by and construed in accordance with the laws of Hong Kong.

References in this excess application form to time are to Hong Kong time unless otherwise stated.

By completing, signing and submitting this excess application form, you agree to disclose to the Company and/or its Hong Kong branch share registrar and their respective advisers and agents personal data and any information which they require about you or the person(s) for whose benefit you have made the application for excess Rights Shares. The Personal Data (Privacy) Ordinance provides the holders of securities with rights to ascertain whether the Company or its Hong Kong branch share registrar hold their personal data, to obtain a copy of that data, and to correct any data that is inaccurate. In accordance with the Personal Data (Privacy) Ordinance, the Company and its Hong Kong branch share registrar have the right to charge a reasonable fee for the processing of any data access request. All requests for access to data or correction of data or for information regarding policies and practices and the kinds of data held should be addressed to the Company, at its principal place of business in Hong Kong at 24th Floor, Two Exchange Square, 8 Connaught Place, Central, Hong Kong or as notified from time to time in accordance with applicable law, for the attention of the Company Secretary or (as the case may be) the Hong Kong branch share registrar.