JUNE 2014



AUDITING FRAUDII

PROPERTY PROBLEMS

BY: ROBERT MEDD

PROPERTY PROBLEMS?

WHAT SHOULD AN PROPERTY AUDIT COST?

- Property fees based on fees/assets rather than fees/turnover.
- Developers typically 0.8 to 4.0 basis points, asset managers 0.5 to 3.0 basis points
- Asia audit extremes: Poly Real Estate vs Guangzhou R&F, Australian REITs

ACCOUNTING RED FLAGS

- 240 Asian companies with US\$1bn+ market cap examined on 11 accounting ratios
- Tests based on: Investments in Related Companies, Customer Deposits, Inventory, Work In Progress, Receivables, Prepayments, Intangibles, Capitalised Interest & Deferred Tax Liabilities
- The 54 companies with 4+ flags underperformed by 37% over the last three years

MINING THE DATA

- China, China, China. The really bad news is all in China
- Most Chinese companies with a market cap over US\$1bn score badly i.e. 4+ flags
- All 4+ flags are Chinese, except Guocoland, Oxley, IJM land and High Wealth
- Co.s with single issues, Filinvest, Lippo, NTT Urban, Capitamalls, Tokyu Fudosan



NO SCANDALS YET

NO ONE HAS COLLAPSED SO FAR...

- Rising property prices & volumes may have helped to hide problems
- But the number companies with lots of red flags suggest it is just a matter of time
- Unqualified audits should not provide any comfort as the due diligence looks limited

ASSET BASED COMPANIES SHOULD BE EASIER TO AUDIT AND SO FEES LOWER

- In many countries, legal title for property is easy to establish and of public record
- Local bank loans mostly require proof of title & purchases are from government
- Economies of scale as a building values should not alter the auditing time

BUT DEVELOPERS ARE VULNERABLE AND AUDITS ARE TOO CHEAP TO BE RELIED ON

- Excessive inventories raise funding risks and magnify pricing risk
- Customer deposits, Prepayments, Intragroup relationships increase opacity
- China Vanke (7), Yuexiu (7), China Fortune (6), Risesun Real (6) and Shenzhen Investment (6) all raise plenty of flags but have low or extremely low cost audits.



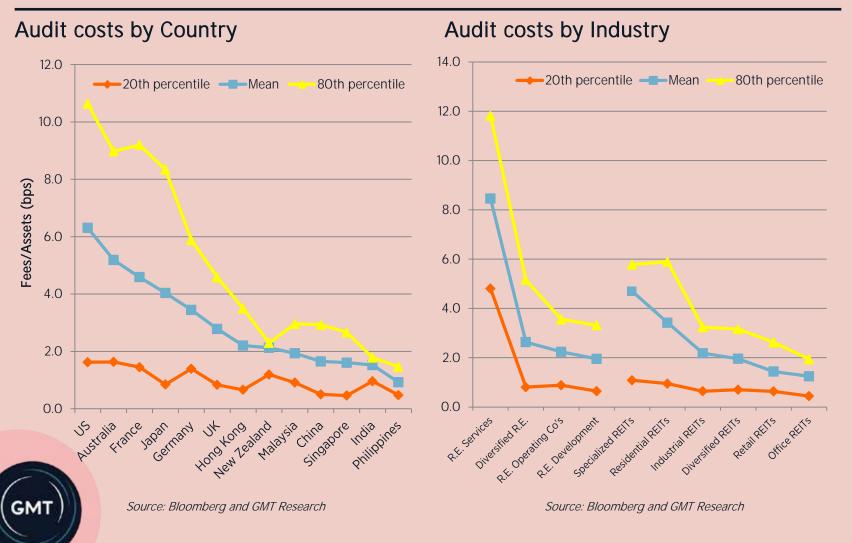
EXTREMELY CHEAP AUDITS

ASIA'S LOWEST AUDITING FEES

| Name | Ticker | Industry | Market cap. (US\$bn) | Total Assets (US\$m) | Audit Fee (US\$) | Audit cost (Bps) |
|------------------|-----------|------------------|----------------------------|----------------------------|---------------------|------------------------|
| Poly Real Esta-A | 600048 CH | R.E. Development | 8.2 | 51,870 | 276,525 | 0.05 |
| China Res Land | 1109 HK | R.E. Development | 10.9 | 36,338 | 433,050 | 0.12 |
| Ascendas Real Es | AREIT SP | Industrial REITs | 4.5 | 5,847 | 69,915 | 0.12 |
| China Fortune-A | 600340 CH | Diversified R.E. | 5.5 | 12,242 | 162,662 | 0.13 |
| China Vanke Co-B | 200002 CH | R.E. Development | 13.5 | 79,176 | 1,382,626 | 0.18 |
| Nanjing Gaoke-A | 600064 CH | Diversified R.E. | 860 | 2,622 | 48,799 | 0.18 |
| Belle Corp | BEL PM | R.E. Development | 1,431 | 711 | 23,579 | 0.32 |
| Special Mention | | | | | | |
| Newtime Infrastr | NIL IN | R.E. Development | 0.1 | 17 | 704 | 0.38 |
| Swan Energy Ltd | SWAN IN | R.E. Development | 0.2 | 211 | 4,137 | 0.20 |
| Amfirst Reit | ARET MK | Office Reits | 0.2 | 420 | 6,467 | 0.15 |



AUDITING COSTS AROUND THE WORLD



AUDIT FEE BENCHMARKS

CONTRASTING FEES IN THE PROPERTY INDUSTRY

| Country | Name | Ticker | Market cap (US\$bn) | Total Assets (US\$bn) | Audit Fee (US\$) | Audit Fee (Bps) |
|-----------|------------------|-----------|------------------------|--------------------------|---------------------|--------------------|
| China | Guangzhou R&F | 2777 HK | 4.0 | 23.1 | 1,530,000 | 0.67 |
| China | Poly Real Estate | 600482 CH | 8.2 | 51.8 | 280,000 | 0.05 |
| | | | | | | |
| Australia | Dexus Property | DXS AU | 5.7 | 7.1 | 2,720,000 | 3.41 |
| Australia | CFS REIT | CFX AU | 5.7 | 7.9 | 760,000 | 0.85 |

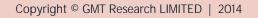
FEE BENCHMARKS

- Normal fee range 0.75-3.0 basis points of Assets
- Fewer extremes and generally tighter ranges compared to industrial companies
- 22% of companies in Asia are in the Low category



CALCULATING NINE RED FLAGS

| ACCOUNTIN | ACCOUNTING RATIO SCORING REQUIREMENTS | | | | | | |
|------------------------------|--|-----------------------|-----|-----------|--|--|--|
| Investr | nents in Relat | ed companies/Equity > | 20% | | | | |
| • Custon | ner Advances | reduce Net Debt by > | 30% | | | | |
| • Pre-Sa | Pre-Sales/Turnover> | | | Multiple | | | |
| Invento | ory days > | | 730 | problems | | | |
| • Work I | • Work In Progress/Total assets > | | | • | | | |
| Receiv | ables | - days > | 60 | should | | | |
| | | Or as a % of Equity > | 20% | equate to | | | |
| • Prepai | d Expenses/E | quity > | 20% | extra due | | | |
| Intangle | bles/Equity > | | 20% | diligence | | | |
| • Capita | Capitalised Interest/Equity > | | | | | | |
| • Deferre | Deferred Taxes/Equity > | | | | | | |
| Unreal | sed profit/Eq | uity > | 30% | | | | |



RED FLAGS MATTER TO INVESTORS...

4+ FLAGS COMPANIES UNDERPERFORM

| Red Flags | 0 | 1 | 2 | 3 | 4 | 5 | 6 | 7 |
|--------------------------------|--------|----------|------|-------|-------|-------|-------|-------|
| Stock performance over 3 years | | | | | | | | |
| Equal weight | 24% | 29% | 20% | (11%) | (21%) | (25%) | (27%) | (7%) |
| Cap. Weighted | 29% | 41% | 39% | (14%) | (14%) | (7%) | (8%) | 10% |
| No of companies | 43 | 39 | 29 | 24 | 25 | 21 | 10 | 6 |
| | | <u> </u> | 27 | 24 | 25 | Ζ1 | 10 | U |
| Performance over | i yeai | | | | | | | |
| Equal weight | (7%) | (5%) | (6%) | (9%) | (14%) | (22%) | (21%) | (16%) |
| Cap. Weighted | (4%) | (4%) | (5%) | (15%) | (20%) | (17%) | (10%) | (28%) |
| No of companies | 51 | 49 | 33 | 27 | 24 | 24 | 11 | 6 |



...BUT NOT TO COMPANY AUDITORS

HIGH FLAGS AND LOW FEES

| Name | Ticker | Industry | Mkt Cap (US\$bn) | Red Flags | Audit Fee (Bps) |
|------------------|-----------|------------------------------------|---------------------|--------------|-----------------------|
| China Vanke Co | 200002 CH | Real Estate Development | 14.3 | 7 | 0.18 |
| Yuexiu Property | 123 HK | Diversified Real Estate Activities | 1.8 | 7 | 0.80 |
| China Fortune | 600340 CH | Diversified Real Estate Activities | 5.5 | 6 | 0.13 |
| Risesun Real | 002146 CH | Real Estate Development | 3.3 | 6 | 0.21 |
| Shenzhen Invest. | 604 HK | Diversified Real Estate Activities | 1.7 | 6 | 0.68 |
| Thaihot Group | 000732 CH | Diversified Real Estate Activities | 1.4 | 5 | 0.20 |
| Shang Shimao-A | 600823 CH | Real Estate Development | 1.6 | 5 | 0.23 |
| China Merchant-B | 200024 CH | Real Estate Development | 4.5 | 5 | 0.26 |
| Jinke Properties | 000656 CH | Real Estate Development | 1.3 | 5 | 0.27 |
| Financial St-A | 000402 CH | Real Estate Development | 2.9 | 5 | 0.30 |
| Beijing Capital | 600376 CH | Real Estate Development | 1.6 | 5 | 0.30 |

THE SHORTLIST

33 COMPANIES HAD MULTIPLE PROBLEMS AND LOW FEES

| Name (Ticker) | Name (Ticker) | Name (Ticker) |
|--------------------------------|---------------------------------|---------------------------------|
| China Vanke (200002 CH) - 7 | Shenzhen Invest (604 HK) - 7 | Carnival Group (996 HK) - 7 |
| Hopson Dev (754 HK) - 7 | Evergrande Real (3333 HK) - 6 | China Fortune (600340 CH) - 6 |
| Risesun Real (002146 CH) - 6 | Franshion Ppt (817 HK) - 6 | Shang Shimao (600823 CH) - 6 |
| Thaihot Group (000732 CH) - 6 | Beijing Capital (600376 CH) - 5 | China Merchant (200024 CH) - 5 |
| Country Garden (2007 HK) - 5 | Financial St-A (000402 CH) - 5 | Greattown Hldg (900940 CH) - 5 |
| Jinke Prop. (000656 CH) - 5 | Kaisa Group Hold (1638 HK) - 5 | Poly Property (119 HK) - 5 |
| Shui On Land Ltd (272 HK) - 5 | Sunac China Hold (1918 HK) - 5 | Guocoland Ltd (GUOL SP) - 6 |
| China Res Land (1109 HK) - 4 | Poly Real Esta (600048 CH) - 4 | Longfor Prop. (960 HK) - 4 |
| Shang Lujiazui (600663 CH) - 4 | Macrolink Real (000620 CH) - 4 | Hangzhou Binj. (002244 CH) - 4 |
| Suning Univ. (000718 CH) - 4 | Beijing Urban (600266 CH) - 4 | Yinyi Real Est. (000981 CH) - 4 |
| Hang Lung Group (10 HK) - 4 | Kerry Properties (683 HK) - 4 | DIf Ltd (DLFU IN) - 4 |

OVER HALF OF THE COMPANIES THAT RAISED 4 OR MORE RED FLAGS

RED FLAG 1: INVESTMENTS IN RELATED CO.S.

SCORED WHEN INVESTMENTS IN RELATED COMPANIES ARE > 20% OF EQUITY Investment in associates/unconsolidated related companies can be used to disguise leverage and move profits/losses from one company to another

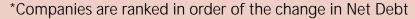
| Short Name | Ticker | Industry | Mkt cap (US\$bn) | Investment as % of equity | Audit Fees (bps) | Audit Fee Range |
|--------------------|---------|---------------------------|---------------------|---------------------------------|------------------------|-----------------------|
| Westfield Group | WDC AU | Retail REITs | 21.1 | 102% | 3.2 | High |
| Capitamalls Asia | CMA SP | Real Estate Operating Co. | 6.9 | 93% | 0.5 | Low |
| Ruentex Develop. | 9945 TT | Real Estate Development | 2.1 | 92% | N/A | N/A |
| Capitaland Ltd | CAPL SP | Diversified Real Estate | 10.3 | 89% | 0.6 | Low |
| Charter Hall Group | CHC AU | Diversified REITs | 1.4 | 77% | 5.3 | High |
| KWG Property | 1813 HK | Real Estate Development | 1.5 | 74% | 0.7 | Normal |
| Westfield Retail | WRT AU | Retail REITs | 8.8 | 67% | 0.8 | Normal |
| Central China | 832 HK | Real Estate Development | 0.6 | 63% | 1.5 | Normal |
| Goodman Group | GMG AU | Industrial REITs | 8.1 | 59% | 2.2 | Normal |
| Sunac China Hldg. | 1918 HK | Real Estate Develop. | 1.5 | 58% | 0.5 | Low |

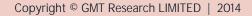


RED FLAG 2: IMPACT OF DEPOSITS ON NET DEBT

SCORED IF CUSTOMER DEPOSITS LOWER NET DEBT BY MORE THAN 30% Customer prepayments and deposits, if sufficiently large, can distort the balance sheet and disguise liquidity issues

| Name | Ticker | Industry | Mkt Cap US\$bn | Net Debt with Deposits | Net Debt without Deposits | Audit cost (bps) | Audit range |
|------------------|-----------|------------------|-------------------|------------------------------|---------------------------------|------------------------|----------------|
| Longfor Prop. | 960 HK | R.E. Develop. | 6.8 | 39% | 64% | 0.3 | Low |
| Hangzhou Binj | 002244 CH | R.E. Develop. | 1.3 | 49% | 77% | 0.3 | Low |
| China Fortune | 600340 CH | Div. Real Estate | 5.5 | 55% | 87% | 0.1 | Low |
| China Vanke C | 200002 CH | R.E. Develop. | 14.3 | 38% | 72% | 0.2 | Low |
| Kaisa Group | 1638 HK | R.E. Develop. | 1.5 | 47% | 72% | 0.5 | Low |
| Suning Universal | 000718 CH | Div. Real Estate | 1.3 | 45% | 71% | 0.4 | Low |
| Aeon Mall Co | 8905 JP | R.E. Op. Co. | 5.6 | 30% | 45% | 0.7 | Low |
| China Overseas | 81 HK | R.E. Develop. | 1.3 | 40% | 55% | 0.4 | Low |
| Country Garden | 2007 HK | R.E. Develop. | 7.8 | 46% | 70% | 0.3 | Low |
| Franshion Ppt | 817 HK | Div. Real Estate | 2.7 | 42% | 57% | 0.4 | Low |





RED FLAG 3: PRE-SALES AS A % OF TURNOVER

SCORED IF PRE-SALES ARE GREATER THAN 50% OF TURNOVER Excessive Customer Prepayments and Deposits may be used to fund unrelated projects allowing the company to overextend itself

| Name | Ticker | Industry | Mkt Cap (US\$bn) | Deposits as a % of Turnover | Audit Fees (Bps) | Audit Fee Range |
|------------------|-----------|-------------------------|---------------------|--------------------------------|------------------------|-----------------------|
| Filinvest Dev | FDC PM | R.E. Development | 1.1 | 334% | N/A | N/A |
| Carnival Group | 996 HK | R.E. Operating Co. | 1.0 | 231% | 0.6 | Low |
| Zhongtian Urban | 000540 CH | R.E. Development | 1.1 | 202% | 0.7 | Normal |
| Hangzhou Binj-A | 002244 CH | R.E. Development | 1.4 | 180% | 0.3 | Low |
| China Fortune-A | 600340 CH | Diversified Real Estate | 5.3 | 178% | 0.1 | Low |
| Beijing Capital | 600376 CH | R.E. Development | 1.5 | 171% | 0.3 | Low |
| Sunshine City | 000671 CH | R.E. Development | 1.3 | 171% | 0.9 | Normal |
| Commodities City | 600415 CH | R.E. Development | 2.4 | 161% | 0.8 | Low |
| Kaisa Group Hldg | 1638 HK | R.E. Development | 1.5 | 152% | 0.5 | Low |
| Beijing Urban-A | 600266 CH | R.E. Development | 1.3 | 142% | 0.3 | Low |



RED FLAG 4: EXCESSIVE INVENTORY

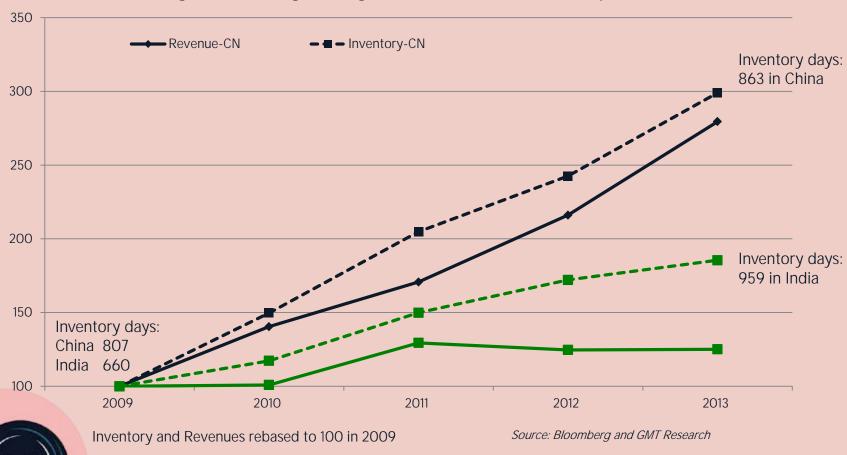
SCORED WHEN INVENTORY EXCEEDS 730 DAYS TURNOVER
Two years inventory should allow for construction time so anything over this is a worry

| Name | Ticker | Industry | Mkt Cap (US\$bn) | Inventory days | Audit Fee (Bps) | Audit Fee Range |
|------------------|-----------|-------------------------|---------------------|-------------------|-----------------------|-----------------------|
| Guocoland Ltd | GUOL SP | Real Estate Development | 2.1 | 2,601 | 0.4 | Low |
| Oceanwide Hold-A | 000046 CH | Diversified Real Estate | 3.3 | 2,283 | N/A | N/A |
| Beijing Capita-A | 600376 CH | Real Estate Development | 1.6 | 1,993 | 0.3 | Low |
| Shang Lujiazui-A | 600663 CH | Diversified Real Estate | 4.4 | 1,963 | 0.5 | Low |
| Hopson Dev | 754 HK | Real Estate Development | 2.0 | 1,785 | 0.4 | Low |
| Cheung Kong | 1 HK | Real Estate Development | 40.2 | 1,712 | 0.2 | Low |
| Shanghai Chent-A | 600649 CH | Real Estate Development | 3.2 | 1,709 | N/A | N/A |
| China Enterprise | 600675 CH | Real Estate Development | 1.4 | 1,682 | 0.6 | Low |
| Keppel Land Ltd | KPLD SP | Real Estate Development | 4.3 | 1,598 | 0.7 | Low |
| Thaihot Group -A | 000732 CH | Diversified Real Estate | 1.4 | 1,569 | 0.2 | Low |



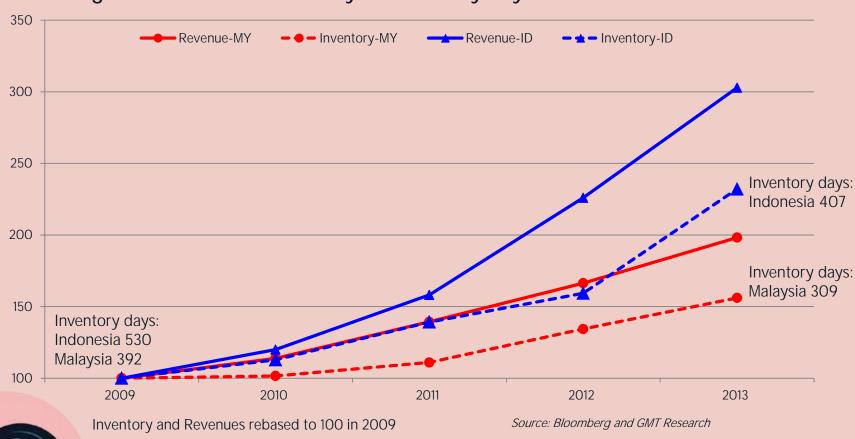
INVENTORY ISSUES - INDIA/CHINA, 2009-2012

Inventories are large and still growing faster than revenues (up 3x in China)



LOOKING HEALTHIER - MALAYSIA/INDONESIA

Revenue grows faster than inventory so inventory days fall



RED FLAG 5: HIGH WIP AS A % OF ASSETS

SCORED WHEN WORK IN PROGRESS EXCEEDS 30% OF TOTAL ASSETS

Picks up completion risk for both developer work in progress and investment projects

| Name | Ticker | Industry | Mkt Cap (US\$bn) | Inventory days | Audit Fee (Bps) | Audit Fee Range |
|------------------|-----------|-------------------------|---------------------|-------------------|-----------------------|-----------------------|
| Pruksa Real Esta | PS TB | Real Estate Development | 1.6 | 87% | N/A | N/A |
| Oceanwide Hold-A | 000046 CH | Diversified Real Estate | 3.3 | 75% | N/A | N/A |
| Suning Universal | 000718 CH | Diversified Real Estate | 1.3 | 71% | 0.4 | Low |
| China Vanke Co-B | 200002 CH | Real Estate Development | 14.3 | 65% | 0.2 | Low |
| Sunshine City -A | 000671 CH | Real Estate Development | 1.4 | 64% | 0.9 | Normal |
| Yanlord Land Gro | YLLG SP | Real Estate Development | 1.7 | 63% | 0.9 | Normal |
| Thaihot Group -A | 000732 CH | Diversified Real Estate | 1.4 | 61% | 0.2 | Low |
| Beijing Urban-A | 600266 CH | Real Estate Development | 1.3 | 60% | 0.3 | Low |
| Yinyi Real Est-A | 000981 CH | Real Estate Development | 1.1 | 59% | 0.6 | Low |
| Jinke Properti-A | 000656 CH | Real Estate Development | 1.3 | 59% | 0.3 | Low |



RED FLAG 6: EXCESSIVE RECEIVABLE DAYS

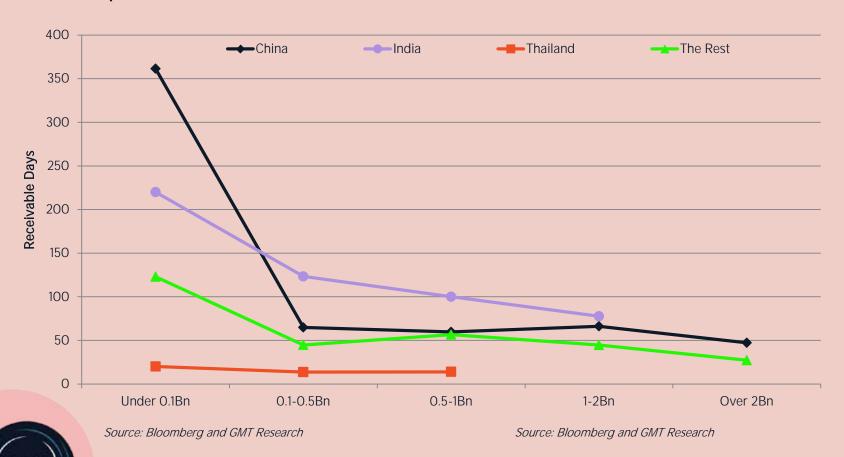
SCORED WHEN RECEIVABLES EXCEED 60 DAYS TURNOVER OR 20% OF EQUITY Excessive receivables expose the company to undue credit risks.

| Name | Ticker | Industry | Mkt Cap (US\$bn) | Receivable days | Audit Fee (Bps) | Audit Fee Range |
|-------------------|-----------|-------------------------|---------------------|--------------------|-----------------------|-----------------------|
| Oxley Holdings | OHL SP | R.E. Development | 1.8 | 567 | 1.0 | Normal |
| Renhe Comm. | 1387 HK | R.E. Operating Co. | 1.1 | 519 | 3.1 | Normal |
| Vista Land & Life | VLL PM | R.E. Development | 1.2 | 336 | 1.7 | Normal |
| Shang Zhangjia | 600895 CH | Diversified Real Estate | 1.6 | 331 | 0.9 | Normal |
| Unitech Ltd | UT IN | R.E. Development | 1.3 | 232 | 1.6 | Normal |
| Megaworld | MEG PM | R.E. Development | 3.4 | 231 | 0.5 | Low |
| Fragrance Gp | FRAG SP | R.E. Development | 1.2 | 210 | 0.8 | Normal |
| Shanghai Indus | 600748 CH | R.E. Development | 1.2 | 187 | 0.5 | Low |
| China Merchant | 200024 CH | R.E. Development | 4.5 | 180 | 0.3 | Low |
| E-House China | EJ US | Real Estate Services | 1.4 | 178 | 10.1 | Normal |



RECEIVABLE ISSUES - INDIA/CHINA

Small companies suffer the most but Thailand has learnt from the crisis



RED FLAG 6: HIGH RECEIVABLES AS % OF EQUITY

SCORED WHEN RECEIVABLES EXCEED 60 DAYS TURNOVER OR 20% OF EQUITY It seems unusual that a property company should be extending vendor credit

| Name | Ticker | Industry | Mkt Cap (US\$bn) | Receivables as a % of equity | Audit Fee (Bps) | Audit Fee Range |
|-----------------|-------------|-------------------------|---------------------|------------------------------------|-----------------------|-----------------------|
| Tianjin Jin | 000897 CH | Real Estate Development | 1.3 | 79% | 0.9 | Normal |
| Lend Lease Gp | LLC AU | Diversified Real Estate | 7.1 | 51% | 5.9 | High |
| China Vanke Co | 200002 CH | Real Estate Development | 14.3 | 49% | 0.2 | Low |
| Risesun Real | 002146 CH | Real Estate Development | 3.3 | 47% | 0.2 | Low |
| China Fortune | 600340 CH | Diversified Real Estate | 5.5 | 41% | 0.1 | Low |
| Sunshine City | 000671 CH | Real Estate Development | 1.4 | 40% | 0.9 | Normal |
| Zhongtian Urbar | n 000540 CH | Real Estate Development | 1.1 | 36% | 0.7 | Normal |
| Gemdale Corp | 600383 CH | Real Estate Development | 5.9 | 35% | N/A | N/A |
| Cifi Holdings | 884 HK | Real Estate Development | 1.1 | 33% | 1.2 | Normal |
| Beijing Capital | 600376 CH | Real Estate Development | 1.6 | 31% | 0.3 | Low |



RED FLAG 7: EXCESSIVE PREPAID EXPENSES

SCORED WHEN PREPAID EXPENSES EXCEED 20% OF EQUITY

Prepaid expenses allow room for fraud and exposes the company to credit risks

| Name | Ticker | Industry | Mkt Cap (US\$bn) | Pre- payment as a % equity | Audit fee (Bps) | Audit Fee Range |
|------------------|-----------|-------------------------|---------------------|----------------------------------|-----------------------|-----------------------|
| Sunshine City -A | 000671 CH | Real Estate Development | 1.4 | 208% | 0.9 | Normal |
| Thaihot Group -A | 000732 CH | Diversified Real Estate | 1.4 | 124% | 0.2 | Low |
| Zhuguang Holding | 1176 HK | R.E. Operating Co. | 1.3 | 82% | 1.6 | Normal |
| Evergrande Real | 3333 HK | Real Estate Development | 6.4 | 82% | 0.4 | Low |
| Unitech Ltd | UT IN | Real Estate Development | 1.3 | 63% | 1.6 | Normal |
| Risesun Real -A | 002146 CH | Real Estate Development | 3.3 | 58% | 0.2 | Low |
| Hangzhou Binj-A | 002244 CH | Real Estate Development | 1.3 | 45% | 0.3 | Low |
| Greattown Hold-B | 900940 CH | Real Estate Development | 1.3 | 40% | 0.5 | Low |
| China Vanke Co-B | 200002 CH | Real Estate Development | 14.3 | 37% | 0.2 | Low |
| Carnival Group | 996 HK | R.E. Operating Co. | 1.0 | 37% | 0.9 | Low |



RED FLAG 8: LARGE INTANGIBLES

SCORED WHEN INTANGIBLES EXCEED 20% OF EQUITY

Goodwill and Intangibles rely on too much managements assessment of their value. Moreover what sort of intangibles does a property company need/create?

| Name | Ticker | Industry | Mkt Cap (US\$bn) | Intangibles / Equity | Audit Fee (Bps) | Audit Fee Range |
|---------------------|---------|------------------------------------|---------------------|----------------------------|-----------------------|-----------------------|
| Tokyu Fudosan | 3289 JP | Diversified Real Estate Activities | 4.9 | 32% | N/A | N/A |
| Lend Lease Grp. | LLC AU | Diversified Real Estate Activities | 7.1 | 29% | 5.9 | High |
| Belle Corp | BEL PM | Real Estate Development | 1.4 | 29% | 0.3 | Low |
| Industrial & Infra. | 3249 JP | Industrial REITs | 1.4 | 27% | N/A | N/A |
| Mori Hills Inves | 3234 JP | Office REITs | 1.9 | 24% | N/A | N/A |
| E-House China | EJ US | Real Estate Services | 1.4 | 23% | 10.1 | Normal |
| Japan Hotel Reit | 8985 JP | Hotel & Resort REITs | 1.2 | 22% | N/A | N/A |
| Daikyo Inc | 8840 JP | Real Estate Development | 1.7 | 21% | 5.2 | High |



RED FLAG 9: CAPITALISED INTEREST

SCORED WHEN CAPITALISED INTEREST EXCEEDS 10% OF EBITDA & 20% OF EARNINGS Capitalising interest improves profits, boosts asset values and disguises credit issues

| Name | Ticker | Industry | Mkt Cap (US\$bn) | Capitalised interest/ EBITDA | Earnings effect w/o capitalising | Audit Fee (Bps) | Audit Fee Range |
|-----------------|-----------|--------------------|---------------------|------------------------------------|--|-----------------------|-----------------------|
| Hopson Dev. | 754 HK | Real Estate Dev. | 2.0 | 75% | (83%) | 0.4 | Low |
| KWG Property | 1813 HK | Real Estate Dev. | 1.7 | 67% | (61%) | 0.7 | Normal |
| Lippo Karawaci | LPKR IJ | Real Estate Dev. | 2.2 | 55% | (81%) | N/A | N/A |
| Evergrande Real | 3333 HK | Real Estate Dev. | 6.4 | 41% | (61%) | 0.4 | Low |
| Kaisa Group | 1638 HK | Real Estate Dev. | 1.5 | 39% | (69%) | 0.5 | Low |
| Financial St-A | 000402 CI | H Real Estate Dev. | 2.9 | 38% | (62%) | 0.3 | Low |
| Sino Ocean | 3377 HK | Real Estate Dev. | 3.9 | 36% | (55%) | 1.0 | Normal |
| Sunac China | 1918 HK | Real Estate Dev. | 1.5 | 32% | (61%) | 0.5 | Low |
| Goodman Group | GMG AU | Industrial REITs | 8.1 | 30% | (59%) | 2.2 | Normal |
| Beijing North-H | 588 HK | Real Estate Dev. | 1.3 | 29% | (64%) | 1.9 | Normal |



RED FLAG 9: CAPITALISED INTEREST

SCORED WHEN CAPITALISED INTEREST EXCEEDS 10% OF EBITDA & 20% OF EARNINGS

Capitalising interest costs makes these companies look profitable

| Name | Ticker | Industry | Mkt Cap (US\$bn) | Capitalised interest/ EBITDA | Earnings effect w/o capitalising | Audit Fee (Bps) | Audit Fee Range |
|------------------|-----------|-------------------|---------------------|------------------------------------|--|-----------------------|-----------------------|
| Shui On Land | 272 HK | Real Estate Dev. | 2.1 | 100% | Turns to loss | 0.5 | Low |
| Guocoland Ltd | GUOL SP | Real Estate Dev. | 2.1 | 100% | Turns to loss | 0.4 | Low |
| Beijing Capita-A | 600376 CH | Real Estate Dev. | 1.6 | 100% | Turns to loss | 0.3 | Low |
| Glorious Propert | 845 HK | Real Estate Dev. | 1.1 | 100% | Turns to loss | 1.9 | Normal |
| Poly Property | 119 HK | Div. Real Estate | 1.6 | 62% | Turns to loss | 0.7 | Low |
| Stockland | SGP AU | Diversified REITs | 8.2 | 31% | Turns to loss | 2.1 | Normal |



RED FLAG 10: HIGH DEFERRED TAX

SCORED WHEN LONG TERM DEFERRED TAX EXCEEDS 15% OF EQUITY

Long term deferred tax liabilities are created when unrealised profits are booked due to revaluations, intra group asset transfers, different tax and accounting depreciation rates or capitalisation of interest

| Name | Ticker | Industry | Mkt Cap (US\$bn) | Deferred Tax/ Equity | Audit fee (Bps) | Audit Fee Range |
|------------------|---------|-------------------------|---------------------|-------------------------|--------------------|--------------------|
| Wanda Comm. | 169 HK | R.E. Development | 1.3 | 102% | 1.9 | Normal |
| Sunac China | 1918 HK | R.E. Development | 1.5 | 48% | 0.5 | Low |
| Mitsubishi Estat | 8802 JP | Diversified Real Estate | 32.8 | 39% | 0.6 | Low |
| NTT Urban Dev | 8933 JP | R.E. Operating Co. | 2.9 | 34% | 0.8 | Low |
| Tokyo Tatemono | 8804 JP | Diversified Real Estate | 3.8 | 24% | 1.3 | Normal |
| Zall Development | 2098 HK | R.E. Development | 1.2 | 23% | 1.3 | Normal |
| Yuexiu Property | 123 HK | Diversified Real Estate | 1.8 | 22% | 0.8 | Normal |
| China South | 1668 HK | Diversified Real Estate | 3.1 | 22% | 1.0 | Normal |
| Tian An China | 28 HK | R.E. Development | 1.2 | 20% | 2.0 | Normal |
| Nomura Real Est. | 3231 JP | Diversified Real Estate | 3.5 | 20% | 1.3 | Normal |



RED FLAG 11: LARGE UNREALISED PROFITS

SCORED WHEN UNREALISED PROFITS EXCEED 30% OF EQUITY

Unrealised profits are the counterparty to Deferred tax. With 15% to 40% tax rates in Asia, the ratio of tax to implied profit varies a lot. For a developer, large unrealised profits as a % of book value questions the real level of operating profit.

| Name | Ticker | Industry | Mkt Cap (US\$bn) | Unrealised Profit/ Equity | Audit fee (Bps) | Audit Fee Range |
|------------------|---------|--------------------|---------------------|---------------------------------|-----------------------|--------------------|
| Wanda Comm. | 169 HK | R.E. Development | 1.3 | 307% | 1.9 | Normal |
| Carnival Group | 996 HK | R.E. Operating Co. | 1.0 | 143% | 0.9 | Low |
| Sunac China | 1918 HK | R.E. Development | 1.5 | 143% | 0.5 | Low |
| Hang Lung Gp | 10 HK | Div. Real Estate | 7.4 | 85% | 0.6 | Low |
| Zall Dev. | 2098 HK | R.E. Development | 1.2 | 68% | 1.3 | Normal |
| Yuexiu Property | 123 HK | Div. Real Estate | 1.8 | 67% | 0.8 | Normal |
| China South | 1668 HK | Div. Real Estate | 3.1 | 66% | 1.0 | Normal |
| Renhe Comm. | 1387 HK | R.E. Operating Co. | 1.1 | 65% | 3.1 | Normal |
| Mitsubishi Estat | 8802 JP | Div. Real Estate | 32.8 | 63% | 0.6 | Low |
| Tian An China In | 28 HK | R.E. Development | 1.2 | 61% | 2.0 | Normal |



CONCLUSIONS

FXTREME FEES SHOULD RAISE CONCERN

- The "Normal" range for property companies is 0.75-3.5 basis points of asset value
- Low fees suggest inadequate due diligence
- Very high fees should make you wonder why

SO SHOULD MULTIPLE FLAGS AND NORMAL FEES

- Lots of problems should attract auditing scrutiny, raising fees
- The 30 companies with problems and low fees are clearly an issue
- But lots of flags and "normal" fees should encourage investors to ask questions

INVESTING ON THE BACK OF EXTREME AUDITS IS A LEAP OF FAITH

- Low fees rely on superb systems, management transparency and honesty
- High fees mean ignoring obvious problems or the possibility of something hidden
- Either way, it is time to dig around



LIST OF APPENDICES

DATA IN DETAIL

- Audit costs by Industry around the world
- Audit costs by Country
- Four or more Red Flags with "Low" Audit Fees
- Four or more Red Flags with "Normal" Audit Fees
- Email Robert@GMTResearch for the spreadsheet covering stocks in Asia, red flag scores and accounting fees



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