



11 May, 2026

**TO:**

**La'o Hamutuk,**

**The Timor-Leste Institute for Development Monitoring and Analysis**

**Rua Felicidade (Rua Cardoso Dias) Gricenfor, Bairro Central, Dili, Timor-Leste**

**Subject: FORMAL LETTER OF DEMAND**

Dear Sirs,

**PELICAN PARADISE GROUP LIMITED** (hereinafter referred to as "Pelican Paradise"), herein duly represented by Soraia Marques, Attorney-at-Law, respectfully submits this letter in reference to your publication dated 2 April 2026 entitled "*La'o Hamutuk appreciates Government's intention to cancel the Pelican Paradise Paradise project*" (the "Statement").

Pelican Paradise is seriously concerned that the Statement contains several false, misleading, and unsubstantiated allegations that have caused, and continue to cause, significant harm to its reputation, commercial interests, and relationships with stakeholders.

Without limitation, Pelican Paradise identifies the following statements as false, misleading, and/or presented in a materially incomplete manner:

a) Allegations of Bad Faith, Corruption and Lack of Credibility

The Statement asserts that the project raised concerns regarding "*bad faith, corruption, feasibility, transparency and credibility.*" These are serious allegations. However, no evidence is provided to substantiate such claims. Pelican Paradise categorically denies any involvement in corruption or bad faith conduct. The publication of such allegations without evidentiary basis is misleading and defamatory.



b) Mischaracterization of Project History and Conduct

The Statement suggests that the project has demonstrated a pattern of “*problematic signs*” since its inception and implies misconduct by Pelican Paradise and its representatives. This is misleading.

As publicly documented and communicated, Pelican Paradise has complied with all applicable legal and regulatory processes, voluntarily returned 56.77 hectares of land of historical significance to the State without any legal obligation to do so, and maintained long-term engagement with the Government despite repeated delays arising from factors outside its control.

These material facts were omitted, creating a distorted and misleading narrative.

c) Misleading Statements Regarding Project Progress

The Statement implies that the project failed to progress proportionately to its scope and promises. This is inaccurate and misleading.

In particular, the Statement fails to acknowledge delays caused by Government actions and infrastructure constraints, the formal execution of the Special Investment Agreement in January 2022, and the subsequent works undertaken by Pelican Paradise, including surveys, construction activities, and overall project development.

The omission of these facts materially misrepresents the project’s progress.

Pelican Paradise previously raised concerns regarding the inaccuracies in the Statement and expressly requested that La’o Hamutuk retract and properly clarify the relevant statements.

In response, the only action taken was the inclusion of a comment on the English version of the blog post which contained a link to Pelican Paradise’s response statement. This falls materially short of any recognized standard for correction, retraction, or clarification.

In particular, the original statements remain published without amendment or qualification, no correction has been incorporated into the body of the Statement, the comment lacks prominence



and is unlikely to be seen by an ordinary reader, and a hyperlink to Pelican's response does not correct or neutralize the false or misleading impressions created by the Statement.

Accordingly, no meaningful or effective steps have been taken to remedy the inaccuracies.

Pelican Paradise formally demands that La'o Hamutuk immediately retract the false and misleading statements identified above and publish a clear, express, and unambiguous correction. Such retraction and clarification must be published in the same medium(s) as the original Statement, be afforded equivalent prominence and visibility (and not be confined to comments, footnotes, hyperlinks, or other inconspicuous formats), and clearly identify the statements that were inaccurate while providing the corresponding corrected information.

Pelican Paradise hereby requires full compliance with the demands set out in this letter within ten (10) days of receipt. Pelican Paradise reserves all its rights, including the right to pursue any and all legal and equitable remedies available to protect its rights, interests, and reputation.

Yours faithfully,

A handwritten signature in dark ink, appearing to read 'Soraia Marques', is written over a horizontal line.

Soraia Marques

JLA, Advogados e Consultores, Lda.

| <u>PROCURAÇÃO</u>  | <u>POWER OF ATTORNEY</u>   |
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| <p>Pelican Paradise Group Limited, sociedade comercial constituída nas Ilhas Virgens Britânicas, com endereço de correspondência em 60 Paya Lebar Road #07-45, Paya Lebar Square (Lobby 2), Singapore 409051 ("<b>Sociedade</b>"), neste ato devidamente representada por <b>Datuk Dr Ong Han Nam</b>, com poderes para o ato, constitui seus bastantes procuradores os Senhores(as) <b>Lukeno Hamud Ribeiro Alkatiri, Soraia Regina dos Santos Marques e Andreia Morris Mendes</b>, Advogados, todos colaboradores da sociedade de advogados <b>JLA, Advogados e Consultores, Lda.</b>, com escritório sito na Av. Presidente Nicolau Lobato, Timor Plaza, CBD 3, 2.º Andar, 202, 20 de Setembro, Bebonuc, Dom Aleixo, Díli, República Democrática de Timor-Leste, aos quais confere os poderes forenses gerais por lei permitidos para efeitos de preparação, apresentação e acompanhamento de uma Carta de Interpelação, a ser dirigida à Organização Não-Governamental <b>La'o Hamutuk</b>, relacionada com um artigo publicado na sua plataforma online referente à <b>Sociedade</b>, incluindo poderes para praticar todos os atos, comunicações e</p> | <p>Pelican Paradise Group Limited, a commercial company incorporated in the British Virgin Islands, with its correspondence address at 60 Paya Lebar Road #07-45, Paya Lebar Square (Lobby 2), Singapore 409051 ("<b>Company</b>"), namely, hereby duly represented by <b>Datuk Dr Ong Han Nam</b>, with the powers for this act, hereby appoints as its legal proxies: <b>Mr. Lukeno Hamud Ribeiro Alkatiri, Ms. Soraia Regina dos Santos Marques and Ms. Andreia Morris Mendes</b>, Lawyers, all from the law firm <b>JLA, Advogados e Consultores, Lda.</b>, with registered office at Av. Presidente Nicolau Lobato, Timor Plaza, CBD 3, 2.º Andar, 202, 20 de Setembro, Bebonuc, Dom Aleixo, Díli, República Democrática de Timor-Leste, and to whom it grants the general legal powers of representation permitted by law, for the purpose of preparing, submitting and following up on a Letter of Demand, to be served upon the Non-Governmental Organization, <b>La'o Hamutuk</b>, in connection with an article published on its online platform concerning the <b>Company</b>, including the authority to undertake all acts, communications and correspondence</p> |

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| correspondência<br>necessários ou convenientes para esse<br>efeito. ----- | considerados | deemed necessary or convenient in<br>relation thereto. -----<br>----- |
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Díli, 11 de maio de 2026 | 11th May 2026



Datuk Dr Ong Han Nam