VIGERS

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10/F, The Grande Building 398 Kwun Tong Road, Kowloon, Hong Kong

Sino Golf Holdings Limited

21st Floor, 1 Duddell Street, Central, Hong Kong

30th September 2016

Our Ref.: DC/FW/KM/SN/VC/VA24406-2016

Dear Sirs,

RE

- (1) PROPOSED SUBSCRIPTION OF SUBSCRIPTION SHARES AND CONVERTIBLE BONDS;
- (2) APPLICATION FOR WHITEWASH WAIVER;
- (3) APPOINTMENT OF DIRECTORS; AND
- (4) NOTICE OF THE SGM

We refer to the circular of Sino Golf Holdings Limited ("the Company") dated 30th September 2016 ("the Circular") in respect of the captioned matter.

We hereby give our consent to the issue of the Circular with the inclusion therein of reference to our name, our opinion, our valuation, the text of letters, and valuation certificate, and our confirmations, in the form and context in which they respectively appear.

Yours faithfully, For and on behalf of

VIGERS APPRAISAL AND CONSULTING LIMITED

David W. I. Cheung
MRICS MHKIS RPS(GP) CREA
RICS Registered Valuer
Executive Director