

利 駿 行 測 量 師 有 限 公 司 LCH (Asia-Pacific) Surveyors Limited

PROFESSIONAL SURVEYOR
PLANT AND MACHINERY VALUER
BUSINESS & FINANCIAL ASSETS VALUER

ESTATE AGENT'S LICENCE (COMPANY) NO. C-009053

30 September 2016

The Board of Directors Sino Golf Holdings Limited 21st Floor, 1 Duddell Street Central Hong Kong

Dear Sirs,

Sino Golf Holdings Limited (the "Company")

- (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 (the "Circular") of the Company dated 30 September 2016 in respect of the captioned matter. Unless the context defines otherwise, capitalised terms used in this letter shall have the same meanings as defined in the Circular.

We hereby confirm that we have given, and have not withdrawn, our written consent to the issue of the Circular with the inclusion therein of our property valuation report and all references to our name in the form and context in which they appear.

We also confirm that, as at the Latest Practicable Date, we was not beneficially interested in the share capital of any member of the Group nor did it have any right (whether legally enforceable or not) to subscribe for or to nominate persons to subscribe for securities in any member of the Group nor did it has any interest, either direct or indirect, in any assets which have been, since the date to which the latest published audited consolidated financial statements of the Group were made up (that is, 31 December 2015), acquired, disposed of by or leased to or are proposed to be acquired or disposed of by or leased to any member of the Group.

We also consent to make available this letter and our property valuation report referred to above for public inspection as described in Appendix III of the Circular.

Yours sincerely, For and on behalf of LCH (Asia-Pacific) Surveyors Limited

Elsa Ng Hung Mui Executive Director

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