

SINO GOLF HOLDINGS LIMITED

順龍控股有限公司

(Incorporated in Bermuda with limited liability)

Stock Code: 00361

SHAREHOLDERS COMMUNICATION POLICY

1. PURPOSE

Sino Golf Holdings Limited (the “Company”) puts great emphasis on effective and timely communications with its shareholders and, in appropriate circumstances, the investment community. The Company has in place policies and procedures for the purpose of assuring proper compliance with the continuous and periodic disclosure obligations under the Rules Governing the Listing of Securities of The Stock Exchange of Hong Kong Limited (the “Listing Rules”), the Companies Ordinance and the Securities & Futures Ordinance. This policy (“Policy”) sets out the provisions with the objective of ensuring that shareholders of the Company (“Shareholders”) and the investment community at large are provided with ready, equal and timely access to balanced and understandable information about the Company so as to enable Shareholders to exercise their rights in an informed manner. Any question regarding this Policy shall be directed to the Company Secretary or the Board.

2. GENERAL POLICY

Unambiguous communication and easy access to information are important features of the Company’s communication policies. Information is communicated to Shareholders and the investment community mainly through:

- ♦ releases to The Stock Exchange of Hong Kong Limited (the “Stock Exchange”) in compliance with the continuous disclosure obligations;
- ♦ publications on the Company’s website at <http://www.sinogolf.com>;
- ♦ interim and annual reports;
- ♦ circulars, announcements and notices of shareholder meetings;
- ♦ annual general meetings and other general meetings as convened from time to time; and
- ♦ briefings and presentations as appropriate.

All announcements of the Company published on the website of the Stock Exchange are concurrently posted to the Company's website, which is regularly updated with other corporate publications and information.

In compliance with the Corporate Governance Code of the Listing Rules, the following information / documents are published on both the websites of the Stock Exchange and the Company:

- ♦ Terms of Reference of three board committees of the Company, namely the Audit Committee, the Remuneration Committee and the Nomination Committee;
- ♦ Constitutional Document of the Company, (i.e. the Bye-laws);
- ♦ List of Directors and their roles and functions; and
- ♦ Procedures to nominate a director for election by Shareholders.

The Company encourages the attendance and participation of Shareholders at general meetings. The annual general meeting provides an excellent opportunity for the Shareholders to express their views and make queries. The Company is committed to listening to and considering the opinions and recommendations made by the Shareholders.

3. SHAREHOLDER PRIVACY

The Company recognizes the importance of Shareholders' privacy and will not disclose Shareholders' information without their consent, unless required by law to do so.

The Company maintains an on-going dialogue with its Shareholders and the investment community and will regularly review the Policy to ensure effectiveness, efficacy and efficiency of the Shareholders' communications. Such Policy will be updated in response to the changes in internal structure, legislative, regulatory and market developments. In particular, Shareholders shall be provided with designated contacts, email addresses and enquiry lines of the Company to enable them to make their queries from time to time.

March 2012