



23 October 2014

Possible general offer

Disclosure of dealings in the shares of SINO GOLF HOLDINGS LIMITED

The Executive received the following disclosure of securities dealings pursuant to Rule 22 of the Hong Kong Code on Takeovers and Mergers:

Party	Date	Purchase / Sale	Number of shares	Price per share	Resultant balance (including those of any person with whom there is an agreement or understanding)	Percentage of class (including those of any person with whom there is an agreement or understanding)
WEBB, David Michael	22 October 2014	Purchase	200,000	\$1.1100	23,238,000	5.0512%

End

Note:

WEBB, David Michael is a Class (6) associate connected with the Offeree company.

Dealings were made for his own account.