

12 November 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:

<b>Party</b>	<b>Date</b>	<b>Purchase / Sale</b>	<b>Number of shares</b>	<b>Price per share</b>	<b>Resultant balance (including those of any person with whom there is an agreement or understanding)</b>	<b>Percentage of class (including those of any person with whom there is an agreement or understanding)</b>
WEBB, David Michael	12 November 2014	Purchase	100,000	\$1.1000	23,438,000	5.0947%
		Purchase	100,000	\$1.0900	23,538,000	5.1164%
		Purchase	20,000	\$1.0700	23,558,000	5.1207%

End

Note:

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

Dealings were made for his own account.