

18 November 2014

SECURITIES AND FUTURES COMMISSION 證券及期貨事務監察委員會

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	Number of shares	Price per share	Resultant balance	Percentage of class
		/ Sale			(including those of	(including those of
					any person with whom	any person with whom
					there is an agreement	there is an agreement
					or understanding)	or understanding)
WEBB, David	18 November	Purchase	100,000	\$1.0700	23,658,000	5.1425%
Michael	2014	Purchase	100,000	\$1.0600	23,758,000	5.1642%
		Purchase	100,000	\$1.0500	23,858,000	5.1860%

End

Note:

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

Dealings were made for his own account.