

10 July 2026

The Directors
Huicheng International Holdings Limited
Room 1303, 13/F.
New East Ocean Centre
9 Science Museum Road
Tsim Sha Tsui East
Kowloon, Hong Kong

Dear Sirs,

Huicheng International Holdings Limited (the "**Company**", together with its subsidiaries, the "**Group**")

Connected transition in relation to the subscription of shares under specific mandate; and application for whitewash waiver (the "Proposed Transactions")

We refer to the circular of the Company dated 10 July 2026 (the "**Circular**") to its shareholders in relation to the Proposed Transactions. Terms used in this letter shall have the same meanings as used in the Circular.


We hereby consent, and confirm that we have not withdrawn our consent, to the issue of the Circular with the inclusion therein of our letter dated 10 July 2026 and/or the references to our name, our opinion and advice in the form and context in which it is included.

We also confirm that as at the Latest Practicable Date:

- (i). we did not have any shareholding, directly or indirectly, in any member of the Group or any right (whether legally enforceable or not) to subscribe for or to nominate persons to subscribe for securities in any member of the Group; and
- (ii). we do not have any direct or indirect interests in any assets which have been, since 31 December 2025 (being the date to which the latest published audited financial statements of the Company were made up), acquired or disposed of by or leased to, any member of the Group, or which are proposed to be acquired or disposed of by or leased to any member of the Group.

Yours faithfully,

For and on behalf of



Stephen Y. W. Yeung
MFin BSc(Hons) Land Adm. MHKIS MCIREA RPS(GP)
Principal