



APAC Asset Valuation and Consulting Limited

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PRIVATE AND CONFIDENTIAL

Date: 13 January 2023

The Board of Directors
Sino Harbour Holdings Group Limited
Room 1215, 12 Floor, Tower B
Hunghom Commercial Centre
37-39 Ma Tau Wai Road
Hunghom, Hong Kong

Dear Sirs,

Re: MAJOR TRANSACTION IN RELATION TO THE DEEMED DISPOSAL OF EQUITY INTEREST OF A SUBSIDIARY

We refer to the circular dated 13 January 2023 issued by the Company in relation to the captioned matter (the "Circular"). Unless otherwise defined, capitalised terms used herein shall have the same meaning as those defined in the Circular.

We, APAC Asset Valuation and Consulting Limited, being the independent valuer appointed by the Company for valuation of the 100% equity interest of 乐平市润泽房地产开发有限公司 do hereby confirm that:

- a. we consent to give and have not withdrawn our written consent to the issue of the Circular with the inclusion therein of the contents of our report dated 13 January 2023 and the references to our name and the report in the form and context which they respectively appear in the Circular;
- b. as at the Latest Practicable Date, we did not have any direct or indirect interest in any assets which had been acquired or disposed of by, or leased to, or which are proposed to be acquired or disposed of by, or leased to, any member of the Group; and
- c. as at the Latest Practicable Date, we did not have any direct or indirect shareholding interest in any member of the Group, or any right (whether legally enforceable or not) to subscribe for or to nominate persons to subscribe for any securities in any member of the Group.

We hereby consent to this letter and the report being made available for inspection as described in the Appendix III to the Circular.

Yours faithfully,
For and on behalf of
APAC Asset Valuation and Consulting Limited

Jasper Chan CFA, FRM
Director