

Date: 25 October 2024

Xingda International Holdings Limited

Unit S03, 7/F, Low block,
Grand Millennium Plaza,
181 Queen's Road Central,
Central, Hong Kong

Great Trade Limited

No. 88, Renmin Road,
Dainan Town, Xinghua,
Jiangsu, China

Dear Sir/Madam,

Xingda International Holdings Limited (Stock Code: 1899) (the "Company")

**COMPOSITE OFFER AND RESPONSE DOCUMENT RELATING TO VOLUNTARY
CONDITIONAL CASH OFFER BY SHENWAN HONGYUAN CAPITAL (H.K.) LIMITED
ON BEHALF OF GREAT TRADE LIMITED TO ACQUIRE ALL OF THE ISSUED SHARES
OF XINGDA INTERNATIONAL HOLDINGS LIMITED (OTHER THAN THOSE ALREADY
OWNED BY OR TO BE ACQUIRED BY GREAT TRADE LIMITED AND PARTIES
ACTING IN CONCERT WITH IT) (the "Composite Document")**

We, Haiwen & Partners, refer to the Composite Document dated or to be dated on or around 25 October 2024.

We hereby confirm that we have given our written consent and have not withdrawn our consent to the issue of the Composite Document with the inclusion of our advice and/or references to our name, logo and/or our qualifications in the form and context in which it is included.

We consent to this letter being made available on display on the website of the SFC and the website of the Company as set out in the section headed "12. Documents on Display" in Appendix III - "General Information of the Group" of the Composite Document.

Yours faithfully

Haiwen & Partners

Haiwen & Partners