



SOMERLEY CAPITAL LIMITED

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Haichang Ocean Park Holdings Limited

31st Floor, Building A

Foreshore Beach

World Trade Centre Phase 1

No. 4, Lane 255, Dongyu Road

Pudong New District

Shanghai, the PRC

31 July 2025

Dear Sirs/Madams,

**(1) SUBSCRIPTION OF NEW SHARES UNDER SPECIFIC MANDATE; AND
(2) APPLICATION FOR WHITEWASH WAIVER**

We refer to the circular issued by Haichang Ocean Park Holdings Limited dated 31 July 2025 (the “**Circular**”) in connection with the captioned matter. Unless otherwise defined, terms used herein shall have the same meanings as those defined or referred to in the Circular.

We hereby give our written consent and confirm that we have not withdrawn our written consent to the issue of the Circular with the inclusion of our letter and all references to our name in the form and context in which they are included.

Yours faithfully,

For and on behalf of

SOMERLEY CAPITAL LIMITED

Clifford Cheng
Director