

**Hebei Construction Group Corporation Limited**

No. 125 Lugang Road

Jingxiu District

Baoding City, Hebei Province

PRC

2 June 2025

Attn: Board of Directors

Dear Sirs,

**Hebei Construction Group Corporation Limited (the “Company”, together with its subsidiaries, the “Group”)**

**Continuing Connected Transaction in relation to the New Labour Subcontract Framework Agreement (the “Transaction”)**

We refer to the circular of the Company dated the date hereof to its shareholders in respect of, among other things, the Transaction (the “**Circular**”). Terms defined in the Circular have the same meanings when used in this letter.

We hereby give, and confirm that we have not withdrawn, our written consent to the issue of the Circular with the inclusion therein of our letter as set out in the Circular (the “**Letter**”) in connection with our recommendation to the Independent Board Committee and the Independent Shareholders and references to our opinion, name, logo and letter in the form and context in which they respectively appear in the Circular.

We also confirm that as at the Latest Practicable Date (as defined in the Circular), we did not have:

- (a) any direct or indirect shareholding 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

- (b) any direct or indirect interests in any assets which have been acquired or disposed of by or leased to or which were proposed to be acquired or disposed of by or leased to any member of the Group since 31 December 2024, being the date to which the latest published audited consolidated accounts of the Company were prepared.

Yours faithfully,  
For and on behalf of  
Halcyon Capital Limited



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Terry Chu  
Managing Director