OVERVIEW OF LAWS AND REGULATIONS IN THE PRC

Our business is primarily in the PRC and is subject to PRC laws and regulations and extensive government supervision. This section sets out a summary of the main laws, regulations, and government supervision relevant to our business in the PRC, but in no event should it be considered as a full account or a comprehensive summary of laws and regulations relating to our Group's operation and business.

MAJOR REGULATORY AUTHORITIES

The major regulatory authorities of China's pharmaceutical industry include the NMPA, the National Health Commission (國家衛生健康委員會) ("**NHC**") and the National Healthcare Security Administration (國家醫療保障局) ("**NHSA**").

NMPA

The NMPA is mainly responsible for the management of safety supervision, standards, registration, quality, post-marketing risks, and supervision and inspection of drugs, cosmetics and medical devices, as well as the supervision of external exchange and cooperation and guidance for the work of local drug supervision and management departments. In March 2018, the State Council Institutional Reform Proposal (國務院機構改革方案) passed by the First Session of the Thirteenth National People's Congress ("**NPC**") (十三屆全國人大第一次會議) decided the China Food and Drug Administration (國家食品藥品監督管理總局) ("**CFDA**") shall cease to exist, and the NMPA was established to undertake the duties of the former CFDA.

NHC

The NHC is mainly responsible for formulating national health policies, coordinating to deepen the reform of the medical and health system, organizing the formulation of a national essential drugs system, and supervising and managing medical services.

NHSA

The NHSA is mainly responsible for formulating and organizing the implementation of policies, plans and standards for medical insurance, maternity insurance, medical aid and other medical security systems, organizing the formulation and adjustment of prices and charging standards for drugs and medical services, and formulating and supervising the implementation of the bidding and procurement policies for drugs and medical consumables.

MAJOR REGULATORY LAWS AND REGULATIONS

Our business in the PRC is subject to a variety of laws, rules and regulations. Such laws, rules and regulations relate to R&D, registration, production, sales, labor, intellectual property rights, taxation and other areas of drugs.

Laws and Regulations in relation to the Pharmaceutical Industry

Drug Administration Laws and Regulations

The Drug Administration Law of the PRC (《中華人民共和國藥品管理法》) (the "**Drug Administration Law**"), which was promulgated by the Standing Committee of the National People's Congress ("**NPCSC**") on September 20, 1984 and last amended on August 26, 2019 and took effect on December 1, 2019, as well as the Implementing Rules for the Drug Administration Law of the PRC (《中華人民共和國藥品管理法實施條例》), which was promulgated by the State Council on August 4, 2002, and last amended on December 6, 2024, together establish the legal framework for the administration of drugs, which govern the R&D, manufacturing, distribution and use in the PRC and the supervision and administration activities thereof.

Non-Clinical Study and Animal Testing

According to the Drug Administration Law, drug research and development activities shall comply with the Good Laboratory Practice for Non-Clinical Studies (藥物非臨床研究質量管理規範) ("**GLP**"), and the entire drug research and development process shall continuously comply with statutory requirements. The GLP, which was promulgated by the former CFDA on August 6, 2003 and amended on July 27, 2017, prescribes quality management requirements concerning the operation and management of non-clinical safety evaluation research institutions and the entire process of non-clinical safety evaluation research project trial protocol design, organization and implementation, execution, inspection, record-keeping, archiving and reporting.

According to the Measures for Administration of Certification of the Good Laboratory Practice for Non-clinical Laboratory Studies (《藥物非臨床研究質量管理規範認證管理辦法》) promulgated by the NMPA on January 19, 2023 which took effect on July 1, 2023, applying for the GLP certification is required for institutions that intend to conduct non-clinical safety evaluation studies in the PRC used for drug registration applications. The NMPA is in charge of the administration of the GLP certification nationwide, while the provincial medical products administrative authorities are responsible for the daily supervision and administration of non-clinical safety evaluation studies institutions within the administrative region. The GLP Certificate will be issued by the NMPA with its approval if the relevant requirements for the GLP

are satisfied by the applicant. The valid period for the GLP certificate lasts for 5 years. Any entity without such certification must engage a qualified third party to conduct such non-clinical studies regulated under relevant laws and regulations.

According to the Administrative Regulations on Experimental Animals (《實驗動物管理條例》) promulgated by the former State Science and Technology Commission (國家科學技術委員會) on November 14, 1988, and latest amended on March 1, 2017 by the State Council, as well as the Administrative Measures on Good Practice of Experimental Animals (《實驗動物質量管理辦法》) jointly promulgated by the former State Science and Technology Commission and the former State Bureau of Quality and Technical Supervision (國家品質技術監督局) on December 11, 1997, and the Administrative Measures on the Certificate for Experimental Animals (Trial) (《實驗動物許可證管理辦法(試行)》) promulgated by the former Ministry of Science and Technology (科學技術部) and other regulatory authorities on December 5, 2001 which took effect on January 1, 2002, using and breeding experimental animals shall be subject to certain rules, and performing experiments on animals requires a Certificate for Use of Experimental Animals. Any entity without such certification must engage a qualified third party to conduct such non-clinical studies regulated under relevant laws and regulations.

Drug Clinical Trial

According to the Provisions for Drug Registration (《藥品註冊管理辦法》), which was promulgated by State Administration for Market Regulation (國家市場監督管理總局) ("**SAMR**") on January 22, 2020, and took effect on July 1, 2020, the drug clinical trial refers to the drug research carried out in human body to determine the safety and effectiveness of drugs for the purpose of drug marketing and registration, which shall be carried out in the drug clinical trial institutions that have the corresponding conditions and are filed in accordance with the provisions. All activities related to drug clinical trials shall comply with the Good Practice for Clinical Trials of Drugs (GCP) (藥物臨床試驗質量管理規範), which was promulgated by the NMPA and the NHC on April 23, 2020, and took effect on July 1, 2020.

According to the Provisions for Drug Registration, drug clinical trials are divided into phase I clinical trials, phase II clinical trials, phase III clinical trials, phase IV clinical trials and bioequivalence trials. Having completed the pharmaceutical, pharmacological and toxicological studies supporting drug clinical trials, to file a drug clinical trial application, the applicant shall submit relevant study data as per requirements on application dossiers. The application shall be accepted when the application dossiers pass preliminary review. The CDE shall organize pharmaceutical, medical and other technical personnel to evaluate the drug clinical trial application accepted. The decision on whether to approve the drug clinical trial shall be made within 60 days upon acceptance, and the applicant shall be informed of the review and approval result via the CDE website; where no notice has been issued within the specified timeline, the application shall

be deemed approved, and the applicant may carry out the drug clinical trial as per the submitted protocol. To carry out a bioequivalence trial, the applicant shall file the bioequivalence trial at the CDE website as required before carrying out relevant studies as per the filed protocol. Drug clinical trials shall be subject to review and approval by an ethics committee. When the drug clinical trial application is approved, the sponsor shall formulate the corresponding drug clinical trial protocols and have them reviewed and approved by the ethics committee before carrying out the subsequent phases of clinical trial, and submit the corresponding protocols and supporting dossiers on the CDE website.

According to the GCP, drug clinical trials shall comply with the principles of the World Medical Association's Declaration of Helsinki (世界醫學大會赫爾辛基宣言) and relevant ethical requirements. The rights, safety, and well-being of trial subjects shall be the primary considerations, taking precedence over interests of science and society. Ethical review and informed consent are essential measures to protect the rights and interests of trial subjects.

International Multi-center Clinical Trials

The Notice on Issuing the International Multi-Center Clinical Trial Guidelines (Trial) (《關於發佈國際多中心藥物臨床試驗指南(試行)的通告》), which was promulgated by the former CFDA on January 30, 2015 and took effect on March 1, 2015, provides guidance for, regulate and supervise the application, implementation and management of international multi-center clinical trials in China, and to encourage Chinese applicants to conduct international multi-center drug clinical trials as a way to speed up the internationalization of drug research and development in the PRC. Where the applicants plan to implement the international multi-center drug clinical trials in China, they shall comply with relevant laws and regulations, such as the Drug Administration Law, the Implementation Regulations for the Drug Administration Law and the Provisions for Drug Registration, observe the GCP of the PRC, make reference to universal international principles such as the International Conference on Harmonization of Technical Requirements for Registration of Pharmaceuticals for Human Use (人用藥品註冊技術國際協調會議臨床試驗品質管制規範) ("**ICH-GCP**"), and abide by the laws and regulations of relevant countries.

On July 6, 2018, the NMPA promulgated the Technical Guiding Principles for the Acceptance of the Overseas Clinical Trial Data of Drugs (《接受藥品境外臨床試驗數據的技術指導原則》) (the "**Guiding Principles**"), which took effect on the same day. It provides that overseas clinical date can be used as clinical evaluation materials and be submitted for registration applications in China. Where the data of international multi-center drug clinical trials are used to apply for drug registration in China, at least two countries including China shall be involved. The Guiding Principles clearly outlines the basic principles and requirements for accepting data from overseas clinical trials, and specifies different levels of acceptance according to the quality of data and the

practical situation. The Guiding Principles requires applicants to ensure the authenticity, integrity, accuracy and traceability of data from overseas clinical trials. In addition, the process in which overseas clinical trial data is generated must follow relevant requirements of the ICH-GCP.

Drug Registration

According to the Drug Administration Law, drugs to be marketed in the territory of the PRC shall be subject to approval by the drug regulatory department under the State Council to obtain the Drug Registration Certificate (藥品註冊證書), except for Chinese medicinal materials (中藥材) and prepared slices of Chinese crude drugs (中藥飲片) which are not subject to review and approval administration. To apply for drug registration, data, documents, and samples that are true, adequate, and credible shall be provided to prove the safety, efficacy, and quality management of the drug.

According to the Provisions for Drug Registration, the NMPA is in charge of the administration of drug registration nationwide and is responsible for establishing the systems, policies and practices for drug registration administration, and for organizing review and approval of drug registration and relevant supervision and administration in accordance with the law. The CDE is responsible for evaluating drug clinical trial applications, drug marketing authorization applications, supplementary applications, and registration renewal applications of drugs manufactured overseas, etc. The National Institutes for Food and Drug Control (NIFDC) (中國食品藥品檢定研究院), the Chinese Pharmacopoeia Commission (CPC) (國家藥典委員會), the Center for Food and Drug Inspection of NMPA (CFDI) (國家藥品監督管理局食品藥品審核查驗中心), the Center for Drug Reevaluation of NMPA (CDR) (國家藥品監督管理局藥品評價中心), the Center for Administrative Services and Complaints & Reports of NMPA (國家藥品監督管理局行政事項受理服務和投訴舉報中心), the Center for Information of NMPA (NMPAIC) (國家藥品監督管理局資訊中心), and other specialized technical institutions for drugs shall undertake such work as drug registration testing, adopted name approval, inspection, monitoring and evaluation, making and delivery of certificates, as well as building and managing the corresponding information system needed for the administration of drug registration in accordance with the law.

Prioritized Review and Approval for Registration of Drugs

On July 7, 2020, the NMPA promulgated the Working Procedures for Review of Breakthrough Therapy Drugs (Interim) (《突破性治療藥物審評工作程式(試行)》), the Working Procedures for Review and Approval of Applications for Conditional Approval of Drug Marketing (Interim) and Working Procedures for Priority Review (《藥品附條件批准上市申請審評審批工作程式(試行)》) and Approval of Drug Marketing Authorization (Interim) (《藥品上市許可優先審評審批工作程式(試行)》) to encourage the research and innovation of new drugs and to standardize the review and approval system of drugs.

According to the Working Procedures for Review of Breakthrough Therapy Drugs (Interim) , during the clinical trial period, for innovative drugs or modified new drugs for the prevention and treatment of diseases that are life-threatening or severely affecting the quality of life and for which no effective prevention and treatment are available, or for innovative drugs or modified new drugs that are fully proved to have significant clinical advantage over existing treatment methods, the applicant can apply for breakthrough therapy designation drug procedure during Phase I and II clinical trials, but usually no later than the commencement of Phase III clinical trial.

According to the Approval of Drug Marketing Authorization (Interim), at the time of application for drug marketing authorization, drugs with significant clinical value in the following categories may apply for the prioritized review and approval procedure:

(i) innovative drugs and improved new drugs addressing clinically needed shortage drugs, as well as for the prevention and treatment of major infectious diseases, rare diseases, and other conditions;

(ii) new varieties, dosage forms, and specifications of pediatric drugs that align with children's physiological characteristics;

(iii) vaccines urgently needed for disease prevention and control, as well as innovative vaccines;

(iv) drugs included in the Breakthrough Therapy Drugs program;

(v) drugs eligible for conditional approval;

(vi) other circumstances specified by the NMPA for prioritized review and approval.

Drug Marketing Authorization Holder System

According to the Drug Administration Law, the marketing authorization holder system is implemented in the PRC for drug administration. The drug marketing authorization holder refers to an enterprise or drug research institution that has obtained the drug registration certificate, which is legally responsible for the safety, efficacy, and quality control of the drug throughout the entire process of research, development, production, distribution, and utilization processes in accordance with laws. The drug marketing authorization holder bears overall responsibility for non-clinical study, clinical trial, manufacturing and business operation, post-market launch study, monitoring, reporting and handling of adverse reactions of the pharmaceuticals. The legal representative and the key person-in-charge of a drug marketing authorization holder shall be fully responsible for the quality of drugs.

The drug marketing authorization holders may produce drugs by itself or entrust drug manufacturers with the production of such drugs. If the drug marketing authorization holder produce drugs by itself, it shall obtain the drug production license in accordance with the provisions of the Drug Administration Law. The production of blood products, narcotic drugs, psychotropic substances, toxic drugs for medical use, and drug precursors are in principle not allowed to be produced through entrustment unless otherwise specified by the drug regulatory department of the State Council.

The drug marketing authorization holders may sell drugs covered by its drug registration certificate on its own or through entrusting qualified drug operating enterprises. If the drug marketing authorization holders engages in drug retailing, it shall obtain the drug supply license.

With the approval of the drug regulatory department of the State Council, the drug marketing authorization holder may transfer the drug marketing authorization. The transferee shall possess the capabilities in quality management, risk prevention and control, and liability compensation to ensure the drug's safety, efficacy, and quality control, and shall fulfill the obligations of the marketing authorization holders.

Drug Manufacturing

According to the Drug Administration Law, the undertaking of drug manufacturing shall obtain a Drug Manufacturing License (藥品生產許可證) granted by the drug regulatory authority of the people's government of the province, autonomous region, or municipality directly under the central government at the place where the enterprise is located. No drugs may be manufactured without the license.

According to the Provisions for the Supervision and Administration of Drug Manufacturing (《藥品生產監督管理辦法》), which was promulgated by the SAMR on January 22, 2020 and took effect on July 1, 2020, the Drug Manufacturing License issued by the relevant regulatory authorities has a validity period of five years upon issuance. Undertaking of drug manufacturing shall be subject to the following requirements:

(i) having legally qualified pharmaceutical professionals, engineering professionals and the necessary technical workers, a legal representative, principal of the company, person in charge of production management ("**production responsible person**"), the persons in charge of quality management ("**quality responsible person**"), qualified persons and other relevant personnel complied with the conditions stipulated in the Drug Administration Law or the Vaccine Administration Law;

(ii) having the premises, facilities, equipment and hygienic environment required for drug manufacturing;

(iii) having the institutions and personnel capable of quality control and testing for the drugs to be manufactured;

(iv) having instruments and equipment essential for quality management and testing for drugs to be manufactured;

(v) having rules and regulations to ensure the quality of drugs, and in compliance with the requirements of the Good Manufacturing Practice for Pharmaceutical Products.

A drug marketing authorization holder entrusting others for manufacturing drug products shall comply with the conditions specified in items (i), (iii) and (v) above, sign an entrustment agreement and quality agreement with a drug manufacturer that meets relevant conditions, submit related agreements and application documents of the actual manufacturing site to the drug regulatory department of the province, autonomous region or municipality directly under the central government where the drug marketing authorization holder is located and apply for the Drug Manufacturing Certificate according to these Provisions.

Drug Distribution

According to the Drug Administration Law, the undertaking of drug wholesale is subject to approval of the local drug regulatory department of the people's government of the province, autonomous region, or municipality directly under the central government and requires a Drug Distribution Certificate (藥品經營許可證). The undertaking of drug retail is subject to approval of the drug regulatory department of the local people's government at or above the county level and requires the said certificate. No drugs may be distributed without the certificate.

According to the Good Supply Practice for Drugs (GSP) (《藥品經營質量管理規範》), which was promulgated by the by the former CFDA on July 13, 2016 which took effect on the same day, enterprises shall take effective quality control measures in drug purchase, storage, sales and transportation to ensure the quality of drugs, and establish a drug traceability system in accordance with the relevant requirements of the State to achieve drug traceability.

According to the Measures for the Supervision and Administration of the Quality of Drug Distribution and Use (《藥品經營和使用質量監督管理辦法》) promulgated by the SAMR on September 27, 2023 which took effect on January 1, 2024, any entity engaged in drug distribution shall comply with the GSP, and shall sell and store drugs at the address approved by the drug regulatory department, in accordance with the business model and scope specified in the Drug

Supply Certificate. It must ensure that the entire drug distribution process complies with statutory requirements. Further, it shall establish a quality management system that covers the entire drug supply process. All records, including purchasing and sales, storage conditions, transportation processes, and quality control, shall be complete and accurate. Falsification or alteration of records is prohibited.

Drug Post-marketing Changes

According to the Measures for the Administration of Drug Post-marketing Changes (Trial) (《藥品上市後變更管理辦法(試行)》) promulgated by the NMPA on January 12, 2021, the categories of changes include changes in marketing authorization holder, changes in drug manufacturing site, and changes to other drug registration matters. Based on the potential impact level of the changes on drug safety, efficacy, and quality controllability, changes are classified into approval-type changes, filing-type changes, and reporting-type changes, implementing hierarchical and categorized management. For approval-class changes, the marketing authorization holder shall submit a supplemental application to the CDE, providing research data in accordance with relevant regulations and technical guidance, and may implement the change only upon approval. For filing-class changes, the marketing authorization holder shall file a record with either the CDE or the provincial-level drug regulatory department. For reporting-class changes, the marketing authorization holder shall manage them according to the relevant change management requirements and include them in the annual report.

OTHER LAWS AND REGULATIONS AFFECTING OUR BUSINESS ACTIVITIES IN THE PRC

Laws and Regulations on Corporation and Foreign Investment

The establishment, operation and management of corporate entities in the PRC are governed by the PRC Company Law, which was promulgated by the NPCSC on December 29, 1993 and came into effect on July 1, 1994, and was last amended on December 29, 2023 and became effective on July 1, 2024. The PRC Company Law generally governs two types of companies, namely limited liability companies and joint stock limited companies. Both types of companies have the status of legal persons, and the liability of shareholders of a limited liability company or a joint stock limited company is limited to the amount of registered capital they have contributed. The PRC Company Law shall also apply to foreign invested companies in the form of a limited liability company or a joint stock limited company. Where laws on foreign investment have other stipulations, such stipulations shall apply.

On January 1, 2020, the Foreign Investment Law of the PRC (《中華人民共和國外商投資法》) ("**Foreign Investment Law**") and the Regulations on the Implementation of the Foreign Investment Law of the PRC (《中華人民共和國外商投資法實施條例》) became effective and simultaneously replaced the trio of prior laws regulating foreign investment in China, namely, the Sino-foreign Equity Joint Venture Enterprise Law of the PRC (《中華人民共和國中外合資經營企業法》), the Sino-foreign Cooperative Joint Venture Enterprise Law of the PRC (《中華人民共和國中外合作經營企業法》) and the Wholly Foreign-invested Enterprise Law of the PRC (《中華人民共和國外資企業法》), together with their implementation rules and ancillary regulations. The Foreign Investment Law sets out the definition of foreign investment and the framework for promotion, protection and administration of foreign investment activities. On December 30, 2019, the Ministry of Commerce of the PRC ("**MOFCOM**") and the SAMR jointly promulgated the Measures for Reporting of Information on Foreign Investment (《外商投資信息報告辦法》), which came into effect on January 1, 2020 and pursuant to which, the establishment of the foreign invested enterprises by foreign investors and establishment through purchasing the equities of a non-foreign invested enterprise and its subsequent changes are required to submit an initial or change report through the Enterprise Registration System.

Pursuant to the Foreign Investment Law, China has adopted a system of national treatment which includes a negative list with respect to foreign investment administration. The negative list will be issued, amended or released upon approval by the State Council, from time to time. The negative list will set forth industries in which foreign investments are prohibited and industries in which foreign investments are restricted. Foreign investment in prohibited industries is not allowed, while foreign investment in restricted industries must satisfy certain conditions stipulated in the negative list. Foreign investments and domestic investments in industries outside the scope of the prohibited industries and restricted industries stipulated in the negative list will be treated equally. The Special Administrative Measures (Negative List) for the Access of Foreign Investment (2024 Version) (《外商投資准入特別管理措施(負面清單) (2024年版)》) ("**Negative List**"), which was promulgated by the National Development and Reform Commission ("**NDRC**") and the MOFCOM on September 6, 2024 and became effective on November 1, 2024, and the Catalog of Industries for Encouraging Foreign Investment (2022 Version) (《鼓勵外商投資產業目錄(2022年版)》) ("**Encouraging Catalog**"), which was promulgated by the NDRC and the MOFCOM on October 26, 2022 and became effective on January 1, 2023, listed the categories of encouraged, restricted, and prohibited industries. Any industry not included in the Negative List shall be administered under the principle of equal treatment to domestic and foreign investment.

As of the Latest Practicable Date, the business of our Company does not belong to any restricted or prohibited industries listed in the Negative List.

Laws and Regulations on Information Security and Data Privacy

On November 7, 2016, the NPCSC promulgated the Cybersecurity Law of the PRC (《中華人民共和國網絡安全法》) ("**Cybersecurity Law**"), which took effect on June 1, 2017 and last amended on October 28, 2025 and will take effect on January 1, 2026. In accordance with the Cybersecurity Law, network operators must comply with applicable laws and regulations and fulfill their obligations to safeguard network security in conducting business and providing services. Network service providers must take technical and other necessary measures as required by laws, regulations and mandatory requirements to safeguard the operation of networks, respond to network security effectively, prevent illegal and criminal activities, and maintain the integrity, confidentiality and usability of network data.

On August 20, 2021, the NPCSC promulgated the Personal Information Protection Law of the PRC (《中華人民共和國個人信息保護法》) ("**Personal Information Protection Law**"), which took effect on November 1, 2021. The Personal Information Protection Law integrates the scattered rules with respect to personal information rights and privacy protection.

On June 10, 2021, the NPCSC promulgated the Data Security Law of the PRC (《中華人民共和國數據安全法》) ("**Data Security Law**"), which took effect on September 1, 2021. In accordance with the Data Security Law, PRC protects the rights and interests of individuals and organizations relating to data, encourages the lawful, reasonable and effective use of data, guarantees the orderly and free flow of data in accordance with the law, and promotes the development of the digital economy with data as a key element. Processors of data shall establish a sound data security management system throughout the whole process, organize data security education and training, and take corresponding technical measures and other necessary measures to ensure data security, in accordance with the provisions of laws and regulations. To carry out data processing activities by making use of the Internet or any other information network, the aforesaid obligations for data security protection shall be performed on the basis of the graded protection system for cybersecurity. Processors of important data shall specify the person responsible for data security and management agencies, implement data security protection responsibilities, periodically conduct risk assessments of such data processing activities as provided and submit risk assessment reports to the relevant authorities.

On September 24, 2024, the State Council promulgated the Regulations on Network Data Security Management (《網絡數據安全管理條例》), which took effect on January 1, 2025. The Regulations on Network Data Security Management prescribes several key obligations, including requiring network data handlers to specify the purpose and method of personal information processing, as well as the types of personal information involved, before any personal information is handled. It also clarifies definitions for important data, outlines the obligations of those handling important data, establishes broader contractual requirements for data sharing between data

handlers, and introduces a new exemption for regulatory obligations regarding cross-border data transfers. The regulation also provides that network data processors conducting any data processing activities that affect or may affect national security shall undergo national security review in accordance with relevant national regulations.

Laws and Regulations on Customs Declaration

The Customs Law of the PRC (《中華人民共和國海關法》) was promulgated by the NPCSC on January 22, 1987, last amended and took effect on April 29, 2021. It stipulates that the customs of the PRC is a governmental organization responsible for supervision and control over all arrivals in and departures from the customs territory. All transports, goods and articles shall enter into or exit from the territory of the PRC at a place where a customs office is established. The customs declaration and duty payment formalities may be undergone by the consignees or consignors of imported and exported goods, or by the customs clearing enterprises entrusted by such consignees or consignors. The consignees or consignors of imported and exported goods and the customs clearing enterprises shall file records with the customs when undergoing customs declaration formalities, otherwise they may be imposed fines by the customs.

According to the Administrative Provisions of the Customs of the PRC on Record-Filing of Customs Declaration Entities (《中華人民共和國海關報關單位備案管理規定》) issued by the General Administration of Customs of the PRC ("**GACC**") (中華人民共和國海關總署) on November 19, 2021 which became effective on January 1, 2022, the consignees or consignors of imported and exported goods and the customs clearing enterprise that apply for the filing of records with the customs shall obtain the status of a market entity, where the consignees or consignors of imported and exported goods apply for the filing of records with the customs, the filing of foreign trade dealers shall also be completed. According to the Announcement on Fully Including the Filing of Customs Declaration Entities in the Reform of "Integrating Multiple Certificates into One" (《關於報關單位備案全面納入"多證合一"改革的公告》) jointly issued by the GACC and the SAMR on December 20, 2021 which became effective from January 1, 2022, applicants for market entity registration may simultaneously register as a customs declarant by selecting the corresponding option and providing required filing details during the application process. The market regulatory authorities will process the registration through the "Multi-Certificate Integration" system and automatically share data with the GACC at the national level. Such applicants are no longer required to submit additional applications for filing as a customs declaration entity to the customs.

In addition, the Decision of the NPCSC on revising the Foreign Trade Law of the PRC (全國人民代表大會常務委員會關於修改《中華人民共和國對外貿易法》的決定) issued by the NPCSC on December 30, 2022 deleted the requirements on the foreign trade dealers engaged in the import and export of goods or technologies to be registered with the competent administrative

departments of foreign trade of the State Council or any institutions authorized thereby, namely the filing of foreign trade dealers. The Foreign Trade Law clarifies that, unless otherwise provided by laws and regulations, the PRC government allows free export and import of goods.

Pursuant to the Foreign Trade Law, and the Regulations of the PRC on the Administration of Import and Export of Goods (《中華人民共和國貨物進出口管理條例》) promulgated by the State Council on December 10, 2001 and last amended on March 10, 2024, which came into effect on May 1, 2024, the administration of import and export goods is divided into categories of prohibited, restricted, and freely permitted ones. For goods prohibited from import or export, it shall not be imported or exported. For restricted import or export goods that are subject to quantitative limitations, it shall be administered through quota administration, other restricted import goods shall be administered through licensing administration, and some goods are under tariff-rate quota administration. For goods free for import or export, the consignee or the consignor shall submit an application for automatic license, which shall not be subject to restriction. The consignee of imported goods or the consignor of exported goods shall submit an automatic import or export license, an import or export license, a quota license or a tariff-rate quota certificate to the customs for customs clearance.

Laws and Regulations on Work Safety

Pursuant to the Work Safety Law of the PRC (《中華人民共和國安全生產法》) ("**Work Safety Law**"), promulgated by the NPCSC on June 29, 2002 and last amended on June 10, 2021, which took effect on September 1, 2021, entities engaged in production and business activities in China shall comply with the Work Safety Law and other laws and regulations related to production safety. Entities shall strengthen the management, establish and improve responsibility systems and policies, improve conditions, strengthen the standardized and information technology development of work safety and improve the production level to ensure their production safety. The primary persons in charge of the production and operation entities are fully responsible for the production safety of their entities. Violation of the Work Safety Law may result in imposition of fines and penalties, suspension of operation, an order to cease operation, or even criminal liability in severe cases.

Laws and Regulations on Product Quality

As per the Product Quality Law of the PRC (《中華人民共和國產品質量法》) promulgated by the NPCSC on February 22, 1993, and last amended and implemented on December 29, 2018, producers shall be responsible for the quality of their products. The product quality shall meet the following requirements: (i) no unreasonable dangers endangering the safety of persons and property; where there are national or industry standards ensuring the health and safety of persons and property, such standards must be complied with; (ii) the product shall possess the properties it

is supposed to possess, except where the product's flaws in their properties are explicitly stated; and (iii) the product shall comply with the product standards stated on the product or its packaging, and meet the quality conditions as represented in product descriptions, physical samples, etc.

Where any producer or seller violates the above responsibilities and obligations, and causes losses or personal or property damages to consumers, it shall be liable for compensation. The competent authority may take administrative penalties against any illegal acts, such as ordering to suspend production, confiscating illegally produced or sold products, imposing a fine, confiscating illegal gains (if any), and revoking the business license in case of a serious violation. If a crime is constituted, it shall be investigated for criminal liabilities in accordance with the law.

According to the Civil Code of the PRC (《中華人民共和國民法典》) promulgated by the NPC on May 28, 2020 and took effect on January 1, 2021, for damages arising from a defective product, the infringed may seek compensation from either the producer or seller of the said product. If the product defect is caused by the producer, the seller shall be entitled to seek reimbursement from the producer upon compensation. If the product defect is caused through the fault of the seller, the producer shall be entitled to seek reimbursement from the seller upon compensation. If a defect is found in a product after it has been put into circulation, the producer and the seller shall take remedial measures in a timely manner including stopping selling, alerts and recalls. In the event of more damage arising from a failure to take remedial measures in a timely manner or inadequate remedial measures, they shall bear tort liability.

Laws and Regulations on Environmental Protection

Pursuant to the Environmental Protection Law of the PRC (中華人民共和國環境保護法) promulgated by the NPCSC on December 26, 1989 and amended on April 24, 2014, which became effective on January 1, 2015, any entity which releases or will release pollutants during the course of operations or other activities must implement effective environmental protection safeguards and procedures to control and properly treat waste gas, waste water, waste residue, dust, malodorous gases, radioactive substances, noise, vibrations, electromagnetic radiation, and other hazards produced during such activities.

Pursuant to the Environmental Impact Assessment of the PRC (《中華人民共和國環境影響評價法》) promulgated by the NPCSC on October 28, 2002, and last amended and took effect on December 29, 2018, for construction projects that have an impact on the environment, entities shall prepare an environmental impact report, report form or registration form in accordance with the severity of the impact that the project may have on the environment.

Pursuant to the Regulations on the Administration of Pollutant Discharge Permits (《排污許可管理條例》) promulgated by the State Council on January 24, 2021, which became effective on March 1, 2021, entities shall be subject to permit management or recordation management based on factors such as the volume of pollutants generated, the volume released into the environment, and the severity of environmental impact. Entities that generate or release significant volumes of pollutants, or which cause a substantial environmental impact, shall apply for pollutant discharge permits. Entities that generate and release only minor volumes of pollutants and cause a limited environmental impact, shall fill out pollutant discharge registration forms, and are not required to apply for a pollutant discharge permit.

Laws and Regulations on Employment and Social Welfare

Employment

The major PRC laws and regulations that govern employment relationships are the PRC Labor Law (《中華人民共和國勞動法》) ("**Labor Law**"), the PRC Labor Contract Law (《中華人民共和國勞動合同法》) ("**Labor Contract Law**") and its implementation regulations, which impose stringent requirements on the employers in relation to entering into employment contracts, hiring of part-time employees and dismissal of employees.

The Labor Law was promulgated by the NPCSC on July 5, 1994, implemented on January 1, 1995, last amended and implemented on December 29, 2018. The Labor Law stipulates matters related to promoting employment, labor contracts, working hours, rest and leave, wages, labor safety and hygiene, special protection for female and minor workers, vocational training, social insurance and welfare, labor disputes, supervision and inspection, as well as legal liabilities.

The Labor Contract Law was issued by the NPCSC on June 29, 2007, implemented on January 1, 2008, and last amended on December 28, 2012, with the revision taking effect on July 1, 2013. The Implementation Regulation of the Labor Contract Law of the PRC (《中華人民共和國勞動合同法實施條例》) was issued and implemented by the State Council on September 18, 2008. According to the aforementioned law and regulations, a written labor contract shall be established when forming a labor relationship. Employers shall not force employees to work overtime and must pay overtime wages according to national regulations if overtime is arranged. Wages must not be lower than the local minimum wage standard and must be paid to employees promptly.

According to the Interpretation (II) of the Supreme People's Court on Issues Concerning the Application of Law in the Trial of Labor Dispute Cases (《最高人民法院關於審理勞動爭議案件適用法律問題的解釋(二)》), which was promulgated by the Supreme People's Court on July 31, 2025, and came into force on September 1, 2025, where an employer and an employee agree, or an employee undertakes to the employer, that social insurance premiums need not be paid, the

people's court shall determine such agreement or undertaking to be invalid. Where an employer fails to pay social insurance premiums in accordance with the law, and an employee claims to terminate the labor contract and demand the employer to pay economic compensation in accordance with the provisions of Item 3 of Article 38 of the Labor Contract Law, the people's court shall support such claim in accordance with the law. Under the circumstances specified in the preceding paragraph, if the employer has paid the social insurance premiums retroactively in accordance with the law and then claims that the employee shall return the compensation for social insurance premiums already paid, the people's court shall support such claim in accordance with the law.

Social Insurance

The PRC Social Insurance Law (《中華人民共和國社會保險法》) ("**Social Insurance Law**") was issued by the NPCSC on October 28, 2010 and last amended and took effect on December 29, 2018, and has established social insurance systems of basic pension insurance, basic medical insurance, work-related injury insurance, unemployment insurance and maternity insurance and has elaborated in detail the legal obligations and liabilities of employers who fail to comply with relevant laws and regulations on social insurance. According to the Social Insurance Law and the Provisional Regulations on Collection and Payment of Social Insurance Premiums (《社會保險費徵繳暫行條例》) promulgated by the State Council on January 22, 1999 and last amended and implemented on March 24, 2019, enterprises shall register social insurance with local social insurance and pay or withhold relevant social insurance for or on behalf of its employees. Any employer who fails to make social insurance contributions may be ordered to rectify the non-compliance and pay the required contributions within a prescribed time limit and be subject to a late fee. If the employer still fails to rectify the failure to make the relevant contributions within the prescribed time, it may be subject to a fine ranging from one to three times the amount overdue.

Housing Provident Fund

Pursuant to the Regulations on Management of Housing Provident Fund (《住房公積金管理條例》), which was promulgated by the State Council on April 3, 1999 and last amended and took effect on March 24, 2019, employers in China shall provide their employees with housing provident fund. Employers who fail to contribute to the above housing provident funds may be ordered to make full payment within a prescribed time period by the housing provident fund management center. If an employer fails to make the payment towards the housing provident fund within a prescribed time limit, an application may be made to a people's court for enforcement.

Laws and Regulations on the Management of Lease Housing

Pursuant to (i) the Law on Administration of Urban Real Estate of the PRC (《中華人民共和國城市房地產管理法》), promulgated by the NPCSC on July 5, 1994 and last amended on August 26, 2019, which took effect on January 1, 2020, and (ii) the Administrative Measures on Leasing of Commodity Housing (《商品房屋租賃管理辦法》), promulgated by the Ministry of Housing and Urban-Rural Development (住房和城鄉建設部) on December 1, 2010 and came into effect on February 1, 2011, when leasing premises, the lessor and lessee are required to enter into a written lease contract, containing such provisions as the leasing term, use of the premises, rental and repair liabilities, and other rights and obligations of both parties. Both the lessor and the lessee shall complete property leasing registration and filing formalities within 30 days from the execution of the property lease contract with the real estate administration department where the leased property is located. If the lessor and lessee fail to go through the registration and filing procedures, both lessor and lessee may be subject to fines.

Laws and Regulations on Intellectual Property Rights

Trademark

The Trademark Law of the PRC (《中華人民共和國商標法》) was promulgated by the NPCSC on August 23, 1982, implemented on March 1, 1983, and last amended on April 23, 2019, with implementation from November 1, 2019. The Regulations for the Implementation of the Trademark Law of the PRC (《中華人民共和國商標法實施條例》) were issued by the State Council on August 3, 2002, and implemented on September 15, 2002, and last amended on April 29, 2014, with implementation from May 1, 2014. According to these laws and regulations, the validity period of a registered trademark is 10 years from the date of approval. To continue using a trademark upon the expiry of its validity, renewal procedures must be completed in accordance with the provisions within the 12 months preceding expiration. If renewal procedures are not completed within this period, a six-month extension is allowed. Each renewal extends the validity period for 10 years, starting from the day following the expiration of the last validity period. Trademark registrants may authorize others to use their registered trademarks by signing trademark licensing agreements, and the licensor shall apply to the Trademark Office for recordation within the term of a valid license contract.

Patent

The Patent Law of the PRC (《中華人民共和國專利法》) was promulgated by the NPCSC on March 12, 1984, implemented on April 1, 1985, and last amended on October 17, 2020, with implementation from June 1, 2021. The Detailed Rules for the Implementation of the Patent Law of the PRC (《中華人民共和國專利法實施細則》) were promulgated by the State Council on June

15, 2001, implemented on July 1, 2001, and last amended on December 11, 2023, with implementation from January 20, 2024. According to these laws, regulations and detailed rules, patents in China are categorized into three types: invention patents, utility model patents and design patents. The term of an invention patent right is 20 years, the term of a utility model patent is 10 years, and the term of a design patent is 15 years, all of which are calculated from the filing date. Any entity or individual that exploits another's patent must conclude a licensing agreement with the patent holder and pay royalties. Exploiting a patent without the permission of the patent holder constitutes an infringement of their patent rights.

Copyright

The Copyright Law of the PRC (《中華人民共和國著作權法》) (the "**Copyright Law**") promulgated by the NPCSC on September 7, 1990, which became effective on June 1, 1991 and was last amended on November 11, 2020, with implementation from June 1, 2021. The amended Copyright Law extends the scope of copyright protection to Internet activities, products disseminated on the Internet and software products. In addition, the China Copyright Protection Center administers a voluntary registration system. According to the Copyright Law, Chinese citizens, legal persons or other organizations own copyright in their copyrightable works (whether published or not), including ingenious intellectual achievements in the fields of literature, art and science that are original and can be expressed in certain forms. Copyright holders enjoy a number of legal rights, including the right of publication, the right of attribution, the right of modification, the right of reproduction, the right of protection of the integrity of the work, and a series of personal and property rights in the work. Infringers of copyright will be subject to various civil liabilities, including cessation of the infringing activity, apology to the copyright owner and compensation for the copyright owner's loss. In serious cases, infringers may also be fined and/or face administrative or criminal liability.

Domain Name

The Internet Domain Name Management Measures (《互聯網域名管理辦法》) were issued by the Ministry of industry and Information Technology of the PRC ("**MIIT**") (中華人民共和國工業和資訊化部) on August 24, 2017, and implemented on November 1, 2017. According to these management measures, the MIIT is the primary regulatory authority for the management of Internet domain names in China. Domain name registration is processed through domain name root servers and their operating institutions, domain name registration management institutions and domain name registration service institutions established in accordance with the relevant regulations.

Laws and Regulations on Foreign Exchange

Pursuant to the Foreign Exchange Administrative Regulations of the PRC (《中華人民共和國外匯管理條例》) promulgated by the State Council on January 29, 1996, effective on April 1, 1996 and last amended on August 5, 2008, and the Administrative Regulations on Foreign Exchange Settlement, Sales and Payment (《結匯、售匯及付匯管理規定》) promulgated by the PBOC on June 20, 1996 and effective on July 1, 1996, Renminbi is freely convertible for payments of current account items such as trade and service-related foreign exchange transactions and dividend payments after the relevant financial institutions have reasonably examined the authenticity of the transaction documents and their consistency with foreign exchange receipts and payments, but are not freely convertible for capital expenditure items such as direct investment, loans or investments in securities outside the PRC unless the approval of the SAFE or its local counterparts is obtained in advance.

According to the Notice on Issues concerning the Foreign Exchange Administration of Overseas Listing (《關於境外上市外匯管理有關問題的通知》) promulgated by the SAFE on December 26, 2014, a domestic company shall, within 15 working days after the completion of its overseas listing, go through the registration of overseas listing with the foreign exchange bureau at its place of registration.

According to the Guidance on Foreign Exchange Business for Capital Account (2024 Edition) (《資本項目外匯業務指引(2024年版)》), proceeds raised by domestic companies through overseas listings shall, in principle, be repatriated to China in a timely manner, either in RMB or foreign currency. The use of proceeds must be consistent with the relevant content disclosed in public documents such as prospectuses, corporate bond offering circulars, shareholders' circulars, board of directors or shareholders' meeting resolutions. Where domestic companies use proceeds raised from overseas listings to engage in activities such as outbound direct investment, overseas securities investment, or overseas lending, they must comply with the relevant foreign exchange regulations.

According to (1) the Circular of the State Administration of Foreign Exchange on Reforming and Regulating Policies for the Administration over Foreign Exchange Settlement of Capital Accounts (《國家外匯管理局關於改革和規範資本項目結匯管理政策的通知》) announced by SAFE which became effective on June 9, 2016, and was last amended on December 4, 2023; (2) the Notice of the State Administration of Foreign Exchange on Further Deepening Reform to Promote Cross-border Trade and Investment Facilitation (《國家外匯管理局關於進一步深化改革促進跨境貿易投資便利化的通知》) announced by SAFE which became effective on December 4, 2023; and (3) the Circular of the State Administration of Foreign Exchange on Matters Concerning Deepening the Reform of Foreign Exchange Administration for Cross-Border Investment and Financing (《國家外匯管理局關於深化跨境投融資外匯管理改革有關事宜的通知》) announced by

SAFE which became effective on September 12, 2025, the foreign exchange receipts under capital accounts of domestic institutions are subject to discretionary settlement policies. The foreign exchange receipts under capital accounts (including foreign exchange capital, foreign debts, and repatriated funds raised through overseas listing) subject to discretionary settlement as expressly prescribed in the relevant policies may be settled with banks according to the actual need of the domestic institutions for business operation. Domestic institutions may, at their discretion, settle up to 100% of foreign exchange receipts under capital accounts for the time being, the SAFE may adjust the above proportion in due time according to the balance of payments. While eligible for the discretionary settlement of foreign exchange receipts under capital accounts, domestic institutions may also opt to use their foreign exchange receipts according to the payment-based settlement system. A bank shall, in handling each transaction of foreign exchange settlement for a domestic institution according to the principle of payment-based settlement, review the authenticity and compliance of the use of the funds settled in the previous foreign exchange settlement (including discretionary settlement and payment-based settlement) of such domestic institution. Domestic institutions' foreign exchange receipts under the capital account and the RMB funds obtained from the settlement thereof shall not (i) directly or indirectly, be used for expenditure prohibited by laws and regulations of the state, (ii) unless otherwise expressly specified, directly or indirectly, be used for investments in securities or other investments or wealth management (excluding financial products with a risk rating no higher than level II and structured deposits), and (iii) be used for the granting of loans to non-affiliated enterprises (except where it is expressly permitted in the business scope).

According to the Circular on Optimizing Administration of Foreign Exchange to Support the Development of Foreign-related Business by the State Administration of Foreign Exchange (《國家外匯管理局關於優化外匯管理支持涉外業務發展的通知》) issued by the SAFE on April 10, 2020, eligible enterprises are allowed to make domestic payments by using receipts under capital accounts, such as their capital funds, foreign credits and the income from overseas listing, without need to provide the evidentiary materials concerning authenticity on a transaction-by-transaction basis to banks in advance, provided that their capital use shall be authentic and in line with provisions, and conform to the prevailing administrative regulations on the use of receipts under capital accounts. Local foreign exchange authorities shall strengthen monitoring analysis and interim and post regulation.

Laws and Regulations on Taxation

Enterprise Income Tax ("EIT")

According to the Enterprise Income Tax Law of the PRC (《中華人民共和國企業所得税法》) ("**EIT Law**") which was promulgated by the NPCSC on March 16, 2007 and last amended on December 29, 2018, a unified income tax rate of 25% will be applied to foreign investment and

foreign enterprises which have set up institutions or facilities in the PRC as well as PRC enterprises. Under the EIT Law, enterprises established outside of China whose "de facto management bodies" are located in China are considered "resident enterprises" and will generally be subject to the unified 25% enterprise income tax rate as to their global income.

According to the Administrative Measures for the Determination of High and New Tech Enterprises (《高新技術企業認定管理辦法》) issued by the Ministry of Science and Technology (科學技術部), the MOF and the STA on April 14, 2008 and amended on January 29, 2016 and implemented on January 1, 2016, enterprises that are recognized as high and new technology enterprises are entitled to enjoy a preferential EIT rate of 15%, under which the validity period of the high and new technology enterprise qualification shall be three years from the date of issuance of the certificate. An enterprise can re-apply for such recognition as a high and new technology enterprise before or after the previous certificate expires.

According to the Announcement of the MOF and STA on Further Implementing Preferential Corporate Income Tax Policies for Small and Low-Profit Enterprises (《財政部、稅務總局關於進一步實施小微企業所得稅優惠政策的公告》) (No. 13 [2022]) issued by the MOF on March 14, 2022, for the period from January 1, 2022 to December 31, 2024, the portion of the annual taxable income of a small and low-profit enterprise that exceeds RMB1 million but does not exceed RMB3 million shall be included in the taxable income at a reduced rate of 25% and subject to corporate income tax at the rate of 20%. Furthermore, in accordance with the Announcement of the Ministry of Finance and the State Taxation Administration on Preferential Income Tax Policies for Small and Low-Profit Enterprises and Self-Employed Individuals (《財政部、稅務總局關於小微企業和個體工商戶所得稅優惠政策的公告》) (No. 6 [2023]) issued by the MOF and the STA on March 26, 2023, for the period from January 1, 2023 to December 31, 2024, the portion of the annual taxable income of a small and low-profit enterprise that does not exceed RMB1 million shall be included in the taxable income at a reduced rate of 25% and subject to corporate income tax at the rate of 20%. Pursuant to the Announcement on Relevant Tax Policies for Further Supporting the Development of Micro and Small-sized Enterprises and Individually Owned Businesses (《關於進一步支援小微企業和個體工商戶發展有關稅費政策的公告》) (No. 12 [2023]), the policy of computing taxable income amount at a reduced rate of 25% for small and low-profit enterprises and paying corporate income tax at a tax rate of 20% continues to apply until December 31, 2027. As stipulated in the aforementioned announcements, a "small and low-profit enterprise" refers to an enterprise engaged in industries that are not restricted or prohibited by the State, and simultaneously meets the following three criteria: annual taxable income does not exceed RMB3 million, the number of employees does not exceed 300, and total assets do not exceed RMB50 million.

Value-Added Tax ("VAT")

According to the Provisional Regulations on Value-Added Tax of the PRC (《中華人民共和國增值税暫行條例》) ("**VAT Provisional Regulations**") promulgated by the State Council on December 13, 1993 and last amended on November 19, 2017, and the Detailed Rules for the Implementation of the Provisional Regulations of the PRC on VAT (《中華人民共和國增值税暫行條例實施細則》) promulgated by the MOF and the STA on December 25, 1993 and last amended on October 28, 2011, any entity or individual who sells goods or provides processing, repair and fabrication services and imports goods within the territory of the PRC is subject to pay VAT.

According to the VAT Provisional Regulations, the Notice on the Adjustment of Value-added Tax Rates (《財政部、國家税務總局關於調整增值税率的通知》) (Cai Shui [2018] No. 32), which was issued by the MOF and the STA on April 4, 2018 and became effective on May 1, 2018 and the Announcement on Relevant Policies for Deepening the Value-added Tax Reform (《關於深化增值税改革有關政策的公告》), which was issued by the MOF, the STA, and the GACC on March 20, 2019 and became effective on April 1, 2019, the applicable value-added tax rates for general taxpayers are 13%, 9% and 6% respectively, and the applicable value-added tax rate for small-scale taxpayers is 3%.

Stamp Duty

According to the Stamp Duty Law of the PRC (《中華人民共和國印花税法》), which was promulgated by the NPCSC on June 10, 2021 and came into effect on July 1, 2022, all entities and individuals who make taxable documents and conduct securities transactions within the territory of the PRC are the taxpayers of stamp duty and shall pay stamp duty. All entities and individuals who make taxable documents outside the territory of the PRC to be used within the territory of the PRC shall pay stamp duty. The disposal of H Shares by non-mainland China investors outside mainland China is not subject to the requirements of the Stamp Duty Law of the PRC.

Laws and Regulations on Dividends and Taxation

Dividends

According to the Foreign Investment Law and its implementing regulations, as well as the Company Law, foreign-invested enterprises may only pay dividends out of their accumulated profits, if any, determined in accordance with PRC accounting standards and regulations. PRC companies are required to withdraw at least 10% of their respective accumulated after-tax profits (if any) each year as a certain capital reserve fund until the accumulated amount of such reserve fund reaches 50% of the registered capital of the enterprise. The PRC companies are not allowed

to distribute any profits until any losses of the previous financial year have been made up. Retained profits from the previous fiscal year may be distributed together with distributable profits from the current fiscal year.

Tax on Dividends

For Individual Investors

According to the Individual Income Tax Law of the PRC (《中華人民共和國個人所得税法》), or the Individual Income Tax Law, amended by the NPCSC on August 31, 2018 and effective on January 1, 2019, and the Implementation Rules of the Individual Income Tax Law of the People's Republic of China (《中華人民共和國個人所得税法實施條例》) amended by the State Council on December 18, 2018, and effective on January 1, 2019, dividends paid by PRC companies to individual investors are ordinarily subject to a withholding income tax levied at a flat rate of 20%. Meanwhile, according to the Notice on Issues Concerning Differentiated Individual Income Tax Policies on Dividends and Bonus of Listed Companies (《關於上市公司股息紅利差別化個人所得税政策有關問題的通知》) issued by the MOF, the STA and the CSRC on September 7, 2015 and effective on September 8, 2015, where an individual holds the shares of a listed company obtained from the public offering for more than one year and transfers the stock of the listed company on the stock market, the dividend and bonus income shall be temporarily exempted from individual income tax. Where an individual acquires shares of a listed company from the public offering and transfers the stock of the listed company on the stock market, if the holding period is within one month (inclusive), the dividend income shall be included in the taxable income in full; if the holding period is more than one month but less than one year (inclusive), the amount of dividend income to be included in the taxable income is temporarily reduced by 50%; the aforesaid income shall be subject to individual income tax at a uniform rate of 20%.

Pursuant to the Arrangement between the Mainland China and the Hong Kong Special Administrative Region for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income (《內地和香港特別行政區關於對所得避免雙重徵税和防止偷漏税的安排》), or the Arrangement for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income, executed on August 21, 2006, the PRC government may impose tax on dividends paid by a PRC company to a Hong Kong resident (including natural person and legal entity), but such tax shall not exceed 10% of the total amount of dividends payable. If a Hong Kong resident directly holds 25% or more of the equity interests in a PRC company and the Hong Kong resident is the beneficial owner of the dividends and meets other conditions, such tax shall not exceed 5% of the total amount of dividends payable by the PRC company. The Fifth Protocol to the Arrangement between the Mainland China and the Hong Kong Special Administrative Region for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with Respect to Taxes on Income (《內地和香港特別行政區關於對所得避免雙重徵税和防

止偷税漏税的安排》第五議定書), or the Fifth Protocol, issued by the STA and effective on December 6, 2019 provides that such provisions shall not apply to arrangements or transactions made for one of the primary purposes of obtaining such tax benefits.

For Enterprise Investors

Pursuant to the Enterprise Income Tax Law of the PRC (《中華人民共和國企業所得税法》), or the EIT Law, last amended by the NPCSC and effective on December 29, 2018, and the Implementation Rules of the Enterprise Income Tax Law of the PRC (《中華人民共和國企業所得税法實施條例》), or the Implementation Rules of the EIT Law, last amended by the State Council and effective on January 20, 2025, a non-resident enterprise is subject to a reduced rate of 10% enterprise income tax on PRC-sourced income, including dividends paid by a PRC resident enterprise that issues and lists shares in Hong Kong, if such non-resident enterprise does not have an establishment or place of business in the PRC or has an establishment or place of business in the PRC but the PRC-sourced income is not actually connected with such establishment or place of business in the PRC. The aforesaid income tax payable by non-resident enterprises shall be withheld at source, and the payer shall be the withholding agent, and the tax shall be withheld by the withholding agent from the payment or due payment every time it is paid or due. Such tax may be reduced or exempted pursuant to an applicable treaty for the avoidance of double taxation.

Pursuant to the Notice from the SAT on the Issues Concerning Withholding the Enterprise Income Tax on the Dividends Paid by Chinese Resident Enterprises to H Share Holders Which Are Overseas Non-resident Enterprises (《國家税務總局關於中國居民企業向境外H股非居民企業股東派發股息代扣代繳企業所得税有關問題的通知》) issued by the STA and effective on November 6, 2008, a PRC resident enterprise is required to withhold enterprise income tax at a rate of 10% on dividends paid to non-PRC resident enterprise holders of H Shares which are derived out of profit generated since 2008.

According to the Fifth Protocol, the PRC government may impose tax on dividends paid by a PRC company to a Hong Kong resident (including natural person and legal entity), but such tax shall not exceed 10% of the total dividends payable by the PRC company. If a Hong Kong resident directly holds 25% or more of equity interest in a PRC company and the Hong Kong resident is the beneficial owner of the dividends and meets other conditions, such tax shall not exceed 5% of the total dividends payable by the PRC company. The Fifth Protocol provides that such provisions shall not apply to arrangements or transactions made for one of the primary purposes of obtaining such tax benefits.

Pursuant to applicable regulations, we intend to withhold tax at a rate of 10% from dividends paid to non-PRC resident enterprise holders of our H Shares (including HKSCC Nominees). Non-PRC resident enterprises that are entitled to be taxed at a reduced rate under an applicable income tax treaty will be required to apply to the PRC tax authorities for a refund of any amount withheld in excess of the applicable treaty rate, and payment of such refund will be subject to the PRC tax authorities' verification.

Tax related to equity transfer income

For Individual Investors

Under the Individual Income Tax Law and its implementation rules, individuals are subject to individual income tax at a rate of 20% on gains realized on the sale of equity interests in PRC resident enterprises. Pursuant to the Circular on Continuing the Temporary Exemption of Individual Income Tax on Gains from Share Transfers by Individuals (《關於個人轉讓股票所得繼續暫免徵收個人所得税的通知》), which was promulgated by the MOF and the STA and became effective on March 30, 1998, from January 1, 1997, income of individuals from the transfer of shares in listed companies continues to be temporarily exempted from individual income tax. The STA does not specify whether to continue to exempt individuals from personal income tax on the income from the transfer of shares in listed companies in the newly revised EIT Law and Implementation Rules of the EIT Law. According to the Announcement of the MOF and the STA on the Catalogue of Continuing Effective Preferential Individual Income Tax Policies (《財政部、國家税務總局關於繼續有效的個人所得税優惠政策目錄的公告》) issued by the MOF and the STA on December 29, 2018, the Circular on Continuing the Temporary Exemption of Individual Income Tax on Gains from Share Transfers by Individuals (《關於個人轉讓股票所得繼續暫免徵收個人所得税的通知》) shall continue to be effective.

For Enterprise Investors

Under the EIT Law and its implementation rules, a non-PRC resident enterprise is subject to enterprise income tax at the rate of 10% with respect to PRC-sourced income, including gains derived from the disposal of shares in a PRC resident enterprise, if it does not have an establishment or premises in the PRC or has an establishment or premises in the PRC but the PRC-sourced income is not actually connected with such establishment or premises in the PRC. The aforementioned income tax payable by non-PRC resident enterprises is subject to source withholding, and the payer is the withholding agent. The tax shall be withheld by the withholding agent from the payment or due payment every time it is paid or due. Such tax may be reduced or exempted under applicable tax treaties or arrangements.

Shanghai-Hong Kong Stock Connect Taxation Policy

Pursuant to the Notice on the Tax Policies Related to the Pilot Program of the Shanghai-Hong Kong Stock Connect (《財政部、國家税務總局、中國證券監督管理委員會關於滬港股票市場交易互聯互通機制試點有關税收政策的通知》) promulgated by the MOF, the STA and the CSRC on October 31, 2014 and effective on November 17, 2014, transfer spread income derived by mainland enterprises from stock investment listed on the Hong Kong Stock Exchange through Shanghai-Hong Kong Stock Connect shall be included in their total income and subject to enterprise income tax according to law. For dividends and bonuses received by mainland individual investors from investing in H shares listed on the Hong Kong Stock Exchange through Shanghai-Hong Kong Stock Connect, the H-share companies shall apply to CSDCC for providing the register of mainland individual investors to the H-share companies and withhold individual income tax at the rate of 20% on behalf of the H-share companies. Pursuant to the Announcement on Extending the Implementation of the Individual Income Tax Policies Concerning the Shanghai-Hong Kong Stock Connect and the Shenzhen- Hong Kong Stock Connect and the Mainland-Hong Kong Mutual Recognition of Funds (《關於延續實施滬港、深港股票市場交易互聯互通機制和內地與香港基金互認有關個人所得税政策的公告》) which was promulgated on August 21, 2023 and implemented on the same date, the transfer spread income derived by mainland individual investors from investing in shares listed on the Hong Kong Stock Exchange through Shanghai-Hong Kong Stock Connect shall be exempted from individual income tax from December 5, 2019 to December 31, 2027. Pursuant to the Notice on the Tax Policies Related to the Pilot Program of the Shanghai-Hong Kong Stock Connect (《財政部、國家税務總局、中國證券監督管理委員會關於滬港股票市場交易互聯互通機制試點有關税收政策的通知》), dividends derived by mainland enterprises from investing in shares listed on the Hong Kong Stock Exchange through Shanghai-Hong Kong Stock Connect are included in their total income and subject to Enterprise Income Tax according to law. Pursuant to this Notice, dividend income obtained by mainland resident enterprises from holding H shares for 12 consecutive months shall be exempted from enterprise income tax according to law. H-share companies shall not withhold income tax on dividends and bonus income for mainland enterprises investors. The tax payable shall be declared and paid by the enterprise itself.

Shenzhen-Hong Kong Stock Connect Taxation Policy

Pursuant to the Notice on the Tax Policies Related to the Pilot Program of the Shenzhen-Hong Kong Stock Connect (《關於深港股票市場交易互聯互通機制試點有關税收政策的通知》) promulgated by the MOF, the STA and the CSRC on November 5, 2016 and effective on December 5, 2016, transfer spread income derived by mainland enterprises from stock investment listed on the Hong Kong Stock Exchange through Shenzhen-Hong Kong Stock Connect shall be included in their total income and subject to enterprise income tax according to law. For dividends and bonuses received by mainland individual investors from investing in H shares listed on the

Hong Kong Stock Exchange through Shenzhen-Hong Kong Stock Connect, the H-share companies shall apply to CSDCC for providing the register of mainland individual investors to the H-share companies and the H-share companies shall withhold individual income tax at the rate of 20% on behalf of the investors.

Pursuant to the Announcement on Continuing the Implementation of the Individual Income Tax Policies Concerning the Shanghai-Hong Kong Stock Connect and the Shenzhen-Hong Kong Stock Connect and the Mainland-Hong Kong Mutual Recognition of Funds (《關於繼續執行滬港、深港股票市場交易互聯互通機制和內地與香港基金互認有關個人所得稅政策的公告》) promulgated by the MOF, the STA and the CSRC on December 4, 2019 and effective on December 5, 2019 and the Announcement on Extending the Implementation of the Individual Income Tax Policies Concerning the Shanghai-Hong Kong Stock Connect and the Shenzhen-Hong Kong Stock Connect and the Mainland-Hong Kong Mutual Recognition of Funds (《關於延續實施滬港、深港股票市場交易互聯互通機制和內地與香港基金互認有關個人所得稅政策的公告》) which promulgated on August 21, 2023 and implemented on the same date, the transfer spread income derived by mainland individual investors from investing in shares listed on the Hong Kong Stock Exchange through Shanghai-Hong Kong Stock Connect and Shenzhen-Hong Kong Stock Connect shall be exempted from individual income tax from December 5, 2019 to December 31, 2027.

Pursuant to the Notice on the Tax Policies Related to the Pilot Program of the Shenzhen-Hong Kong Stock Connect (《關於深港股票市場交易互聯互通機制試點有關稅收政策的通知》), dividends derived by mainland enterprises investors from investing in shares listed on the Hong Kong Stock Exchange through Shenzhen-Hong Kong Stock Connect are included in their total income and subject to Enterprise Income Tax according to law. In particular, dividend and bonus income obtained by mainland resident enterprises from holding H shares for 12 consecutive months shall be exempted from enterprise income tax according to law. H-share companies shall not withhold income tax on dividends and bonus income for mainland enterprises. The tax payable shall be declared and paid by the enterprise itself.

Laws and Regulations Relating to Overseas Offering and Listing

Overseas Listing Trial Measures

On February 17, 2023, the CSRC promulgated the Overseas Listing Trial Measures (《境內企業境外發行證券和上市管理試行辦法》) and relevant five guidelines ("**Overseas Listing Trial Measures**"), which came into effect on March 31, 2023. According to the Overseas Listing Trial Measures, PRC domestic enterprises that seek to offer and list securities in overseas markets, either in direct or indirect means, are required to fulfill the filing procedure with the CSRC and submit filing reports, legal opinions, and other relevant documents. Subject to specific circumstances, the Overseas Listing Trial Measures require that, among other things, (i) initial

public offerings or listings on overseas markets shall be filed with the CSRC within three working days after the relevant application is submitted overseas, (ii) subsequent securities offerings of an issuer on the same overseas market where it has previously offered and listed securities shall be filed with the CSRC within three working days after the offering is completed, and (iii) subsequent securities offerings or listings of an issuer on other overseas markets other than where it has offered and listed securities shall be filed with the CSRC within three working days after the relevant application is submitted overseas. If a PRC company fails to complete the filing procedure or the filing documents submitted by a PRC company contain misrepresentation, misleading statement or material omission, such PRC company may be subject to order to rectify, warnings and fines, and its controlling shareholders, actual controllers, the person directly in charge and other directly responsible persons may also be subject to fines.

The Overseas Listing Trial Measures also set forth the issuer's reporting obligations in the event of occurrence of material events (Material Events) after the Overseas Offering and Listing. Upon the occurrence of any of the Material Events specified below after the Overseas Offering and Listing, the issuer shall make a detailed report to the CSRC within three working days after the occurrence and public announcement of the relevant event: (i) change in controlling rights; (ii) being subject to investigation, punishment or other measures by overseas securities regulatory authorities or the relevant authorities; (iii) changing listing status or changing the listing board; or (iv) voluntary or compulsory termination of listing. Besides, if any material change in the principal business and operation of the issuer after its Overseas Offering and Listing makes the issuer no longer within the scope of record-filing, the issuer shall submit a special report and a legal opinion issued by a PRC domestic law firm to the CSRC within three working days after the occurrence of the relevant change to provide an explanation of the relevant situation. According to the Overseas Listing Trial Measures, the PRC domestic enterprises engaging in Overseas Offering and Listing activities shall strictly comply with the PRC laws, administrative regulations, and relevant provisions on foreign investment, state-owned assets, industry regulation, overseas investment, etc., shall not disrupt domestic market order, and shall not harm national interests, public interests and the legitimate rights and interests of domestic investors. The PRC domestic enterprise that conducts Overseas Offering and Listing shall (i) formulate its articles of association, improve its internal control system and standardize its corporate governance, financial affairs and accounting activities in accordance with the PRC Company Law, the PRC Accounting Law and other PRC laws, administrative regulations and applicable provisions; (ii) abide by the legal system of the PRC on confidentiality and take necessary measures to implement the confidentiality responsibility, shall not divulge any state secret or the work secrets of state authorities, and shall also comply with laws, administrative regulations and the relevant provisions of the PRC where involved in the overseas provisions of personal information and important data.

In addition, the Overseas Listing Trial Measures also provides the circumstances where the Overseas Offering and Listing is explicitly prohibited, including: (i) such securities offering and listing is explicitly prohibited by provisions in laws, administrative regulations and relevant state rules; (ii) the Overseas Offering and Listing may endanger national security as reviewed and determined by competent authorities under the State Council in accordance with law; (iii) the PRC domestic enterprise, or its controlling shareholder(s) and the actual controller, have committed relevant crimes such as corruption, bribery, embezzlement, misappropriation of property or undermining the order of the socialist market economy during the latest three years; (iv) the PRC domestic enterprise is currently under investigations for suspicion of criminal offenses or major violations of laws and regulations, and no conclusion has yet been made thereof; or (v) there are material ownership disputes over equity held by the controlling shareholder(s) or by other shareholder(s) that are controlled by the controlling shareholder(s) and/or actual controller.

Confidentiality and Archives Administration Concerning Overseas Listing

The Provisions on Strengthening the Confidentiality and File Management of Domestic Enterprises Related to Overseas Issuance of Securities and Listing (《關於加強境內企業境外發行證券和上市相關保密和檔案管理工作的規定》) were promulgated by the CSRC together with the MOF, the National Administration of State Secrets Protection (國家保密局) and the National Archives Administration of the PRC (國家檔案局) on February 24, 2023 and implemented on March 31, 2023. According to which, during the overseas offering and listing activities of domestic enterprises, domestic enterprises, securities companies and securities service providers providing corresponding services shall strictly abide by the relevant PRC laws and regulation as well as the requirements of the provisions, enhance legal awareness of guarding state secrets and strengthening the management of archives, establish and complete systems for confidentiality and archives work, take necessary measures to implement the responsibility for confidentiality and archives management, and shall not divulge state secrets and work secrets of state organs, and shall not harm the interests of state and the public. If domestic enterprises provide or publicly disclose to relevant securities companies, securities service institutions, overseas regulatory agencies and other parties, or provide or publicly disclose documents and materials involving state secrets or state organ work secrets through the issuer, they shall report the matters to the competent authorities for examination and approval, and file them with the department for the administration and management of state secrets at the same level for the record.

Full Circulation of H Shares

According to the "Full Circulation" Program for Domestic Unlisted Shares of H-share Listed Companies (《H股公司境內未上市股份申請"全流通"業務指引》) ("**Full Circulation**" Guidelines), promulgated by the CSRC on August 10, 2023, "Full circulation" represents listing and circulating on the Stock Exchange of the domestic unlisted shares of a domestic H-share listed company,

including unlisted domestic shares held by domestic shareholders prior to overseas listing, unlisted domestic shares additionally issued after overseas listing, and unlisted shares held by foreign shareholders.

According to "Full Circulation" Guidelines, shareholders of domestic unlisted shares may determine by themselves through consultation the amount and proportion of shares, for which an application will be filed for circulation, provided that the requirements laid down in the relevant laws and regulations and set out in the policies for state-owned asset administration, foreign investment and industry regulation are met, and the corresponding H-share listed company may be entrusted to file the said application for "full circulation". Pursuant to the Overseas Listing Trial Measures, shareholders holding unlisted shares in the PRC shall comply with the relevant requirements of the CSRC and appoint a domestic enterprise to file a report with the CSRC.

On December 31, 2019, China Securities Depository and Clearing Corporation Limited ("**CSDCC**") and Shenzhen Stock Exchange jointly announced the Measures for Implementation of H-share "Full Circulation" Business (《H股"全流通"業務實施細則》) ("**Measures for Implementation**"). The businesses of cross-border share transfer registration, maintenance of deposit and holding details, transaction entrustment and instruction transmission, settlement, management of settlement participants, services of nominal holders, etc. in relation to the H-share "full circulation business", are subject to these Measures for Implementation.

In order to fully promote the reform of H-shares "full circulation" and clarify the business arrangement and procedures for the relevant shares' registration, custody, settlement and delivery, Shenzhen Branch of CSDCC has issued the Guidelines to the Program for "Full Circulation" of H-shares (《中國證券登記結算有限責任公司深圳分公司H股"全流通"業務指南》) in September, 2024, which was last amended in June, 2025, and specified the business preparation, account arrangement, cross-border share transfer registration and overseas centralized custody, etc.