RELEVANT LAWS AND REGULATIONS IN THE PRC

We are subject to a variety of PRC laws, rules and regulations affecting many aspects of our business. This section summarizes the principal PRC laws, regulations and rules that we believe are relevant to our business and operations.

Regulation on the Company Law and Foreign Investment

The establishment, operation, and management of enterprises in China are governed by the Company Law of the People's Republic of China (《中華人民共和國公司法》), or the Company Law, enacted by the Standing Committee of the National People's Congress (the "SCNPC"), in December 1993, and subsequently revised in December 1999, August 2004, October 2005, December 2013, October 2018, and December 2023. The latest revised Company Law, which took effect on July 1, 2024, primarily introduces revisions to refine the company formation and exit mechanisms, optimize corporate governance structures, enhance the capital contribution system, strengthen the liabilities of controlling shareholders and management personnel, and emphasize corporate social responsibilities.

The National People's Congress (the "NPC") promulgated the Foreign Investment Law of the People's Republic of China (《中華人民共和國外商投資法》), or the Foreign Investment Law in March 2019. The Law came into effect on January 1, 2020, simultaneously repealing the Law of the People's Republic of China on Wholly Foreign-Owned Enterprises (《中華人民共和國外資企業法》), the Law of the People's Republic of China on Sino-Foreign Equity Joint Ventures (《中華人民共和國中外合資經營企業法》), and the Law of the People's Republic of China on Sino-Foreign Contractual Joint Ventures (《中華人民共和國中外合作經營企業法》). Thereafter, the Foreign Investment Law has served as the fundamental legislation governing foreign investors (including foreign individuals, enterprises, or other organizations) in making direct or indirect investments in China. Direct or indirect investment activities by foreign investors in China include the following: 1) a foreign investor establishes a foreign-invested enterprise in China independently or in collaboration with other investors; 2) a foreign investor acquires shares, equity, property stakes, or other similar rights/interests in a Chinese domestic enterprise; 3) a foreign investor invests independently or jointly with other investors in a new project in China; and 4) other forms of investment as prescribed by laws, administrative regulations, or the State Council.

On December 26, 2019, the State Council promulgated the Implementing Regulations of the Foreign Investment Law of the People's Republic of China (《中華人民共和國外商投資法實施條例》), or the FIL Implementing Regulations, which took effect in January 2020. The FIL Implementing Regulations further specify that the State encourages and facilitates foreign investment, safeguards the lawful rights and interests of foreign investors, regulates foreign investment administration, continuously improves the foreign investment environment, and promotes higher-standard opening-up.

China applies a pre-establishment national treatment plus negative list management system for foreign investment. Pre-establishment national treatment means that foreign investors and their investments shall be accorded treatment no less favorable than that accorded to domestic investors and their investments during the investment establishment phase. The negative list refers to the special administrative measures for market access imposed by the State on foreign investment in specific sectors. Foreign investments not falling within the negative list shall receive national treatment.

The National Development and Reform Commission (the "NDRC") and the Ministry of Commerce (the "MOFCOM") jointly released the Catalogue of Encouraged Industries for Foreign Investment (2025 Edition) (《鼓勵外商投資產業目錄(2025年版)》) on December 15, 2025, which will take effect on February 1, 2026. On September 6, 2024, they issued the Special Administrative Measures for Market Access of Foreign Investment (Negative List) (2024 Edition) (《外商投資准入特別管理措施(負面清單)(2024年版)》) (the "Negative List"), which came into force on November 1, 2024. The Negative List uniformly sets out the special administrative measures for the entry of foreign investment, such as requirements on equity and senior executives. For sectors not listed in the Negative List, management shall be implemented under the principle of equal treatment for domestic and foreign investment. Domestic enterprises operating in sectors prohibited under the Negative List that seek to issue shares and list overseas shall obtain approval from the relevant competent authorities. Foreign investors shall be prohibited from participating in the corporate governance of such enterprises, and their shareholding ratio shall comply with the applicable regulations governing foreign investment in domestic securities.

The Measures for the Reporting of Foreign Investment Information (《外商投資信息報告辦法》) were jointly issued by the MOFCOM and the State Administration for Market Regulation (the "SAMR") on December 30, 2019, and came into effect on January 1, 2020. Pursuant to the Measures for the Reporting of Foreign Investment Information, where a foreign investor conducts investment activities directly or indirectly within the territory of China, such foreign investor or the relevant foreign-invested enterprise shall submit investment information reports to the competent commerce authorities in accordance with these Measures. Foreign-invested enterprises shall submit annual reports including basic enterprise information, information on investors and their de facto controller(s), and operational and financial information (including assets and liabilities). For sectors subject to the Special Administrative Measures for Foreign Investment Market Access (Negative List), enterprises shall additionally submit documentation of obtained industry licenses/permits.

On December 19, 2020, the NDRC and the MOFCOM jointly promulgated the Measures on the Security Review of Foreign Investment (《外商投資安全審查辦法》), effective on January 18, 2021, setting forth provisions concerning the security review mechanism on foreign investment, including the types of investments subject to review, review scopes and procedures, among others. The Office of the Working Mechanism of the Security Review of Foreign Investment (外商投資安全審查工作機制辦公室) (the "Office of the Working Mechanism") is established under the NDRC, who lead the task together with the MOFCOM. Foreign investor or relevant parties in China must declare the security review to the Office of

the Working Mechanism prior to (i) the investments in the military industry, military industrial supporting and other fields relating to the security of national defense, and investments in areas surrounding military facilities and military industry facilities; and (ii) investments in important agricultural products, important energy and resources, important equipment manufacturing, important infrastructure, important transport services, important cultural products and services, important information technology and internet products and services, important financial services, key technologies and other important fields relating to national security, and obtain control in the target enterprise. Control exists when the foreign investor (i) holds over 50% equity interests in the target, (ii) has voting rights that can materially impact on the resolutions of the board of directors or shareholders meeting of the target even when it holds less than 50% equity interests in the target, or (iii) has material impact on target's business decisions, human resources, accounting and technology.

Regulations on Value-added Telecommunications services

The Telecommunications Regulations of the PRC (《中華人民共和國電信條例》) (the "Telecommunications Regulations"), which were promulgated by the State Council on September 25, 2000 and amended on July 29, 2014 and February 6, 2016, provide the regulatory framework for telecommunications services providers in the PRC. The Telecommunications Regulations categorize telecommunications services in the PRC into basic telecommunications services and value-added telecommunications services, and value-added telecommunications services are defined as telecommunications and information services provided through public network infrastructures. Under the Telecommunications Regulations, telecommunications services providers shall obtain operating licenses from the Ministry of Industry and Information Technology of the PRC (中華人民共和國工業和信息化部) (the "MIIT") or its provincial counterparts prior to the commencement of operations.

The Administrative Measures for Telecommunications Business Operating License (《電信業務經營許可管理辦法》) with latest amendments becoming effective from September 1, 2017 set forth more specific provisions regarding the types of licenses required for value-added telecommunications services and the qualifications and procedures for obtaining such licenses. The value-added telecommunications services operators providing value-added services across multiple provinces are required to obtain inter-regional licenses from the MIIT, whereas value-added telecommunications services operators providing such services within a single province are required to obtain local licenses from the provincial level counterparts.

The Classified Catalog of Telecommunications Services (2015 Version) (《電信業務分類目錄(2015年版)》), or the 2015 MIIT Catalog, effective on March 1, 2016, and amended on June 6, 2019, divides telecommunication services into two major categories: A. basic telecommunication services, and B. value-added telecommunication services. Online data processing and transaction processing services constitute a subcategory of value-added telecommunications services. Online data processing and transaction processing services refer to the services of online data processing and transaction/affair processing provided for users through public communication networks or the Internet, by utilizing various kinds of data and affair/transaction processing application platforms that are connected to public communication

networks or the Internet. The services of online data processing and transaction processing include transaction processing services, electronic data exchange services and network/electronic equipment data processing services. According to the 2015 MIIT Catalog, the Group's EDI license is within sub-categories under "value-added telecommunication services" category.

The Administrative Measures on Internet Information Services (《互聯網信息服務管理辦法》), or the IIS Measures, promulgated by the State Council on September 25, 2000 and last amended on December 6, 2024, divides internet-based information services into services of a commercial nature and services of a non-commercial nature. According to IIS Measures, internet-based information services of a commercial nature refer to the charged services of providing information or web pages creation services to the online users through the internet. The 2015 MIIT Catalog further classifies the information services into five detailed sub-categories, i.e., (i) information release platform and transmission services, (ii) information search and inquiry services, (iii) information community platform services, (iv) instant information interaction services, and (v) information protection and processing services. In addition, according to IIS Measures, non-commercial internet-based information services refer to that is free of charge services that supply, through the Internet, to online users information that is open to and shared by the general public.

Pursuant to the Measures for the Archival Administration of Non-operational Internet Information Services (《非經營性互聯網信息服務備案管理辦法》) issued on February 8, 2005 and latest revised and implemented on January 18, 2024, whoever intends to provide non-operational Internet information services inside the PRC shall go through the procedures for archiving in accordance with the law. Those failing to go through the procedures for archiving before providing non-operational Internet information services or providing services in excess of the archived items shall be ordered by the provincial telecommunications administration at the locality of its/his domicile to make a correction within a time limit, and be fined RMB5,000 up to RMB10,000 in addition; if it/he refuses to make a correction, its/his website shall be closed.

In addition, the provision of application information services and application distribution services in the PRC is specially regulated by the Administrative Provisions on Mobile Internet Application Information Services (《移動互聯網應用程序信息服務管理規定》) (the "APP Provisions"), which was promulgated by the Cyberspace Administration of China (中華人民共和國國家互聯網信息辦公室) (the "CAC") on June 28, 2016 and last amended on June 14, 2022. According to the APP Provisions, the CAC and local offices of cyberspace administration shall be responsible for the supervision and administration of nationwide and local application information respectively. The application information service providers shall acquire relevant qualifications required by laws and regulations and implement the information security management responsibilities strictly and fulfill their obligations, including verifying user identity information, protecting users' information, examining and managing information content.

Regulations on Foreign Investment in Value-Added Telecommunications Services

Pursuant to the Negative List and the Administrative Regulations on Foreign-Invested Telecommunications Enterprises (《外商投資電信企業管理規定》), which were issued by the State Council on December 11, 2001 and latest amended on March 29, 2022, the ultimate capital contribution percentage by foreign investor(s) in a foreign-invested value-added telecommunications services enterprises (except for e-commerce, domestic multi-party communications, storage-forwarding and call centers) is up to 50% and the primary foreign investor should be equipped with a good track record and operational experience in the industry. Pursuant to the Decision of the State Council on Revising and Repealing Some Administrative Regulations (《國務院關於修改和廢止部分行政法規的決定》), which was issued by the State Council on March 29, 2022 and came into effect on May 1, 2022, the criterion of "having good track record and operational experience in value-added telecommunications businesses" has been removed.

According to the MIIT Circular on Removing Foreign Equity Ratio Restrictions on Online Data and Transaction Processing Business (Commercial E-Commerce) (《工業和信息化部關於放開在線數據處理與交易處理業務(經營類電子商務)外資股比限制的通告》), promulgated by the MIIT on June 19, 2015, as well as the Negative List, foreign investors are allowed to hold up to 100% of all equity interest in an online data and transaction processing business (commercial e-commerce) in China. An e-commerce operator shall obtain a license for value-added telecommunications services with the specification of online data processing and transaction processing business from appropriate telecommunications authorities, pursuant to the Telecommunications Regulations and the Catalog of Telecommunications Services.

Pursuant to the MII Circular on Strengthening the Administration of Foreign Investment in and Operation of Value-added Telecommunications Services (《信息產業部關於加強外商投資經營增值電信業務管理的通知》), issued by the Ministry of Information Industry (the "MII", which is the predecessor of the MIIT) on July 13, 2006, domestic enterprises are prohibited to rent, transfer or sell licenses for value-added telecommunications services to foreign investors in any form, or provide any resources, premises, facilities or other assistance in any form to foreign investors for their illegal operation of any value-added telecommunications business in China.

Regulations on Online Trading

The Measures for the Supervision and Administration of Online Trading (《網絡交易監督管理辦法》) (the "Online Trading Measures") promulgated by the SAMR on March 15, 2021 and last amended on March 18, 2025, stipulate the obligations of online trading operators. The Online Trading Measures stipulate the obligations of online commodity dealers and relevant service providers and certain special requirements applicable to third-party platform operators. Online business operators and third-party online platform operators are prohibited from collecting any information on consumers and business operators, or disclosing, selling or providing any such information to any third party, or sending commercial electronic messages to consumers, without their consent. Fictitious transactions, deletion of adverse comments and

technical attacks on competitors' websites are prohibited as well. In addition, third-party online platform operators are required to examine and verify the identifications of the online business operators and set up and keep relevant records for at least three years. On December 24, 2014, the MOFCOM promulgated the Provisions on the Procedures for Formulating Transaction Rules of Third Party Online Retail Platforms (Trial) (《網絡零售第三方平台交易規則制定程序規定(試行)》) which came into effect on April 1, 2015 to regulate the formulation, revision, and enforcement of transaction rules for online retail marketplace platforms.

On August 31, 2018, the SCNPC promulgated the E-Commerce Law of the PRC (《中華人民共和國電子商務法》), which came into effect on January 1, 2019. Pursuant to the E-Commerce Law, an e-commerce platform operator shall (i) collect, verify and register the truthful information submitted by the third-party merchants that apply to sell products or provide services on its platform, including the identities, addresses, contacts and licenses, establish registration archives and update such information on a regular basis; (ii) submit the identification information of the third-party merchants on its platform to market regulatory administrative department as required and remind the third-party merchants to complete the registration with market regulatory administrative department; (iii) record and retain the information of the products and services and the transaction information for no less than 3 years; (iv) display the platform service agreement and the transaction rules or links to such information on the homepage of the platform.

An e-commerce platform operator must obtain a license for value-added telecommunications services with the specification of online data processing and transaction processing business from appropriate telecommunications authorities, pursuant to the Telecommunications Regulations and the Catalog of Classification of Telecommunications Services.

Regulation on Consumer Protection

The Consumer Protection Law of the PRC (《中華人民共和國消費者權益保護法》) (the "Consumer Protection Law") was first promulgated by the SCNPC on October 31, 1993 and was last amended on October 25, 2013, effective on March 15, 2014. The Consumer Protection Law sets out the obligations of business operators and the rights and interests of consumers. Business operators must guarantee the quality, function, usage and term of validity of the goods or services they sell or provide, if these goods and services are consumed under normal standards. The consumers whose interests have been damaged due to their purchase of goods or acceptance of services on online platforms may claim damages from the sellers or service providers. Online platform operators may be subject to liabilities if the lawful rights and interests of consumers are infringed in connection with consumers' purchase of goods or acceptance of services on online platforms if the platform operators fail to provide consumers with authentic contact information of the sellers or service providers. If an online platform provider, knowing or having reason to know that a seller or service provider is using its platform to infringe upon the lawful rights and interests of consumers, fails to take necessary measures, it shall bear joint and several liability with such seller or service provider. The Implementation Rules of the Consumer Protection Law of the PRC (《中華人民共和國消費者

權益保護法實施條例》) was promulgated by the State Council on March 15, 2024 and came into effect on July 1, 2024, according to which, if the business operators adopt automatic extension, automatic renewal, or other similar mechanisms in connection with the provisions of their services, the business operators must prominently draw the attention of the consumers before they accept the service and before the dates of automatic extension, automatic renewal, or effectiveness of other mechanisms. The business operators cannot send commercial information to consumers or make commercial telephone calls without the consent of the consumers. In the event that a consumer consents to receiving commercial information and/or commercial telephone calls, the business operators must provide clear and convenient means of cancellation and must immediately stop these behaviors if the consumer chooses to cancel.

Regulation of Advertisement

The Advertisement Law of the PRC (《中華人民共和國廣告法》), which was promulgated by the SCNPC on October 27, 1994 and last amended on April 29, 2021, requires advertisers to ensure that the content of the advertisements are true. The content of advertisements cannot contain prohibited information, including but not limited to: (i) information that harms the dignity or interests of the nation or divulges the secrets of the nation, (ii) information that contains wordings such as "national level," "highest level," or "best," and (iii) information that contains ethnic, racial, religious, or sexual discrimination.

On February 25, 2023, the SAMR promulgated the Measures on Internet Advertising (《互聯網廣告管理辦法》) (the "Internet Advertising Measures"), which became effective on May 1, 2023, to regulate any advertisement published on the internet, including but not limited to, through websites, webpages and apps, in the form of word, picture, audio and video and provide more detailed guidelines to the advertisers, advertising operators and advertising distributors. Internet advertisers are responsible for the authenticity of the content of advertisements and may publish advertisements by setting up a website or an internet medium owned by them, or by entrusting internet advertising operators or advertising publishers to publish advertisements. Internet platform operators must take measures in the process of providing Internet information services to prevent and stop illegal advertisements. In addition, it is not allowed to cheat or mislead users to click on or browse advertisements in the following ways: (1) false system or software updates, error reporting, removal, notice and other prompts; (2) false signs such as playing, starting, pausing, stopping, and returning; (3) false reward promises; and (4) other methods to cheat or mislead users. Any violation of the Internet Advertising Measures may result in fines, prohibition of publishing advertisements for a period of time or withdrawal of business licenses, and other penalties.

Regulations on Information Security and Censorship

Internet content in China is regulated and restricted from a state security standpoint. The SCNPC enacted the Decisions on the Maintenance of Internet Security (《關於維護互聯網安全的決定》) on December 28, 2000, which was amended on August 27, 2009, that may subject persons to criminal liabilities in China for any attempt to: (i) gain improper entry to a computer or system of strategic importance; (ii) disseminate politically disruptive information; (iii) leak state secrets; (iv) spread false commercial information or (v) infringe upon intellectual property rights.

On June 22, 2007, the Ministry of Public Security (公安部) (the "MPS"), National Administration of State Secrets Protection (國家保密局), State Council Information Office (abolished) and State Cryptography Administration (國家密碼管理局) issued the Administrative Measures for the Hierarchical Protection of Information Security (《信息安全等級保護管理辦法》), which regulate that the security protection of an information system may be graded into five level. As for an information system of Grade II or above which has been put into operation, its operator or user shall, within 30 days since the date when its security protection grade is determined, complete the record-filing procedures at the local public security organ at the level of city divided into districts or above. For an information system of Grade II or above newly built, its operator or user shall, within 30 days after it is put into operation, complete the record-filing procedures at the local public security organ at the level of municipality divided into districts or above.

According to the Regulations of the PRC on the Security Protection of Computer Information System (《中華人民共和國計算機信息系統安全保護條例》), which were issued by the State Council on February 18, 1994 and amended on January 8, 2011, securing computer information systems includes safeguarding the computer and its related and supporting sets of equipment and facilities (including network), the operating environment and information and ensuring the normal performance of computer functions, so as to maintain the safe operation of computer information systems.

In 1997, the MPS issued the Administration Measures on the Security Protection of Computer Information Network with International Connections (《計算機信息網絡國際聯網安全保護管理辦法》), which were amended by the State Council on January 8, 2011 and prohibit using the Internet in ways which, among others, result in a leakage of state secrets or a spread of socially destabilizing content.

On November 7, 2016, the SCNPC promulgated the Cyber Security Law of the PRC (《中華人民共和國網絡安全法》), which was last amended on October 28, 2025 and took effect on January 1, 2026, pursuant to which, network operators shall comply with laws and regulations and fulfill their obligations to safeguard security of the network when conducting business and providing services. Those who provide services through networks shall take technical measures and other necessary measures pursuant to laws, regulations and compulsory national standards to safeguard the safe and stable operation of the networks, respond to network security incidents effectively, prevent illegal and criminal activities, and maintain the integrity,

confidentiality and usability of network data, and the network operator shall not collect the personal information irrelevant to the services it provides or collect or use the personal information in violation of the provisions of laws or agreements between both parties. Network operators of critical information infrastructure shall store within the territory of the PRC all the personal information and important data collected and produced within the territory of PRC. Where such information and data need to be provided abroad for business purpose, security assessment shall be conducted pursuant to the measures developed by the national cyberspace administration together with competent departments of the State Council, unless otherwise provided for in laws and administrative regulations. The purchase of network products and services by the network operators of critical information infrastructure that may affect national security shall be subject to national cybersecurity review.

On December 28, 2021, the CAC together with 12 other authorities, jointly promulgated the Measures for Cybersecurity Review (《網絡安全審查辦法》) (the "CAC Measures"), which took effect on February 15, 2022 and replaced its previous version promulgated on April 13, 2020. The CAC Measures provide that: (i) network platform operators that are engaged in data processing activities which have or may have an implication on national security shall undergo a cybersecurity review; (ii) the CSRC is one of the regulatory authorities for purposes of jointly establishing the state cybersecurity review mechanism; (iii) network platform operators that master personal information of more than one million users and seek to list abroad (國外上市) shall file for a cybersecurity review with the Cybersecurity Review Office (網絡安全審查辦公室); (iv) critical information infrastructure operators purchasing network products and services or online platform operators carrying out data processing activities, which affect or may affect national security, shall conduct a cybersecurity review as well; and (v) the risks of core data, material data or large amounts of personal information being stolen, leaked, destroyed, damaged, illegally used or transmitted to overseas parties, and the risks of critical information infrastructure, core data, material data or large amounts of personal information being influenced, controlled or used maliciously shall be collectively taken into consideration during the cybersecurity review process.

On June 10, 2021, the SCNPC promulgated the PRC Data Security Law (《中華人民共和國數據安全法》), which took effect in September 2021. The PRC Data Security Law introduces a data classification and hierarchical protection system based on the materiality of data in economic and social development, as well as the degree of harm it will cause to national security, public interests, or legitimate rights and interests of persons or entities when such data is tampered with, destroyed, divulged, or illegally acquired or used. It also provides for a security review procedure for the data activities which may affect national security. In addition, the PRC Data Security Law provides that important data handlers shall appoint a data security officer and establish a management department to take charge of data security, and such handlers shall evaluate the risk of their data activities periodically and file assessment reports with the relevant regulatory authorities. Furthermore, data transaction intermediary service providers shall check the sources of the data, the identities of parties involved in the data transactions and keep records accordingly.

On July 7, 2022, the CAC issued the Measures for the Security Assessment of Data Cross-border Transfer (《數據出境安全評估辦法》) which took effective on September 1, 2022. The Measures for the Security Assessment of Data Cross-border Transfer require that any data processor providing important data collected and generated during operations within the territory of the PRC or personal information that should be subject to security assessment according to law to an overseas recipient shall conduct security assessment. It provides five circumstances, under any of which data processors shall, through the local cyberspace administration at the provincial level, apply to the national cyberspace administration for security assessment of data cross-border transfer. These circumstances include: (i) where the data to be transferred to an overseas recipient is personal information collected and generated by operators of critical information infrastructure; (ii) where the data to be transferred to an overseas recipient contain important data; (iii) where a personal information processor that has processed personal information of more than one million people provides personal information overseas; (iv) where the personal information of more than 100,000 people or sensitive personal information of more than 10,000 people are transferred overseas accumulatively; or (v) other circumstances under which security assessment of data cross-border transfer is required as prescribed by the national cyberspace administration.

According to the Measures for Standard Contract for Outbound Transfer of Personal Information (《個人信息出境標準合同辦法》) issued by the CAC on February 22, 2023 and effective from June 1, 2023, to provide personal information to an overseas recipient through the conclusion of the standard contract, a personal information processor shall meet all of the following circumstances: (i) it is not a critical information infrastructure operator; (ii) it has processed the personal information of less than one million individuals; (iii) it has cumulatively provided the personal information of less than 100,000 individuals to overseas recipients since January 1 of the previous year; and (iv) it has cumulatively provided the sensitive personal information of less than 10,000 individuals since January 1 of the previous year.

On March 22, 2024, the CAC issued the Provisions on Promoting and Regulating Cross-border Flow of Data (《促進和規範數據跨境流動規定》), or the New Cross-border Data Flow Provisions, which took effect on the same day. The New Cross-border Data Flow Provisions state that if there is any conflict with the Security Assessment Measures, the New Cross-border Data Flow Provisions shall prevail. The New Cross-border Data Flow Provisions set out scenarios under which certain obligations for the cross-border data transfer are waived, which include, among others, passing the security assessment of cross-border data transfer, concluding a standard contract for the cross-border transfer of personal information or obtaining the personal information protection certification.

On September 24, 2024, the Cyber Data Security Regulations (《網絡數據安全管理條例》) was promulgated by the State Council and has come into effect on January 1, 2025. The Cyber Data Security Regulations is to implement general requirements on data security management from the Cybersecurity Law, the Data Security Law, as well as the Personal Information Protection Law, reiterating the general regulations for data processing activities and rules of personal information protection, important data security protection, network data

cross-border transfer management, and internet platform service providers' obligations. The Cyber Data Security Regulations do not include detailed content related to cybersecurity review standards for listing abroad, as mentioned previously in the Administration Governing the Cyber Data Security (Draft for Comments), published on November 14, 2021.

On December 8, 2022, the MIIT promulgated the Measures for the Administration of Data Security in the Field of Industry and Information Technology (Trial) (《工業和信息化領域數據安全管理辦法(試行)》), which came into effect on January 1, 2023. Data handlers in the field of industry and information technology shall take the main responsibility for the security of data processing activities, implement hierarchical protection for various types of data, and where different levels of data are being processed at the same time and it is difficult to take separate protection measures, the protection shall be implemented in accordance with the requirements of the highest levels, to ensure that the data continues to be effectively protected and legally utilized.

Regulations on Privacy Protection

On December 13, 2005, the MPS issued the Regulations on Technological Measures for Internet Security Protection (《互聯網安全保護技術措施規定》) (the "Internet Protection Measures") which took effect on March 1, 2006. The Internet Protection Measures require Internet service providers to take proper measures including anti-virus, data back-up and other related measures, and to keep records of certain information about their users (including user registration information, log-in and log-out time, IP address, content and time of posts by users) for at least 60 days, and detect illegal information, stop transmission of such information, and keep relevant records. Internet service providers are prohibited from unauthorized disclosure of users' information to any third parties unless such disclosure is required by the laws and regulations. They are further required to establish management systems and take technological measures to safeguard the freedom and secrecy of the users' correspondences.

On December 29, 2011, the MIIT promulgated the Several Provisions on Regulating the Market Order of Internet Information Service (《規範互聯網信息服務市場秩序若干規定》), becoming effective on March 15, 2012, which stipulate that without the consent of users, Internet information service providers shall not collect information relevant to the users that can lead to the recognition of the identity of the users independently or in combination with other information (hereinafter referred to as "personal information of users"), nor shall they provide personal information of users to others, unless otherwise provided by laws and administrative regulations. The Several Provisions on Regulating the Market Order of Internet Information Service also require that Internet information service providers shall properly keep the personal information of users; if the preserved personal information of users is divulged or may possibly be divulged, Internet information service providers shall immediately take remedial measures; where such incident causes or may cause serious consequences, they shall immediately report the same to the telecommunications administration authorities that grant them with the Internet information service license or filing and cooperate in the investigation and disposal carried out by relevant departments.

On December 28, 2012, the SCNPC promulgated the Decision on Strengthening Information Protection on Networks (《關於加強網絡信息保護的決定》) to enhance the protection of information security and privacy on the Internet. In particular, network service providers and other enterprises and institutions shall, when gathering and using electronic personal information in business activities, adhere to the principles of legality, legitimacy and necessity, explicitly state the purposes, manners and scopes of the collection and use of information, and obtain the consent of those from whom information is collected, and shall not collect and use information in violation of laws and regulations and the agreement between both sides; strictly keep the electronic personal information collected in business activities confidential and may not divulge, alter, damage, sell, or illegally provide others with such information; take technical and other necessary measures to ensure information security and prevent the leakage, damage, or loss of personal electronic information collected in business activities; and take remedial measures immediately when information leakage, damage or loss occurs or may occur.

In July 2013, the MIIT promulgated the Provisions on Protection of Personal Information of Telecommunication and Internet Users (《電信和互聯網用戶個人信息保護規定》), which came into effect on September 1, 2013, to regulate the collection and use of users' personal information in the provision of telecommunication services and Internet information services in the PRC. According to such provisions, the personal information includes a user's name, birth date, identification card number, address, phone number, account name, password and other information that can be used for identifying a user independently or in combination with other information. Telecommunication business operators and Internet service providers are required to constitute their own rules for the collection and use of users' information and they cannot collect or use user's information without users' consent. Telecommunication business operators and Internet service providers must specify the purposes, manners and scopes of information collection and use, obtain consent of the relevant citizens, and keep the collected personal information confidential. Telecommunication business operators and Internet service providers are prohibited from disclosing, tampering with, damaging, selling or illegally providing others with collected personal information. Telecommunication business operators and Internet service providers are required to take technical and other measures to prevent the collected personal information from any unauthorized disclosure, damage or loss.

Pursuant to the Ninth Amendment to the Criminal Law of the PRC (《中華人民共和國刑法修正案(九)》) issued by the Standing Committee of the NPC in August 2015, which became effective in November 2015, any person or organization that violates relevant state regulations by selling or providing citizens' personal information to others or obtaining citizens' personal information will be subject to criminal penalty in serious cases. Moreover, on May 8, 2017, the Supreme People's Court and the Supreme People's Procuratorate released the Interpretations of the Supreme People's Court and the Supreme People's Procuratorate on Several Issues Concerning the Application of Law in the Handling of Criminal Cases Involving Infringement of Citizens' Personal Information (《最高人民法院、最高人民檢察院關於辦理侵犯公民個人信息刑事案件適用法律若干問題的解釋》), which became effective on June 1, 2017. The Interpretations determine the scope of citizens' personal information under the Criminal Law of the People's Republic of China, and explain other issues related to criminal offenses involving the infringement of personal information.

According to the Cyber Security Law of the PRC, network operator shall not collect personal information irrelevant to the services it provides or collect or use personal information in violation of the provisions of laws or agreements between both parties.

On November 28, 2019, the CAC, the MIIT, the MPS and the SAMR jointly issued the Notice of Illegal Collection and Use of Personal Information by App (《App違法違規收集使用個人信息行為認定方法》), which explains six types of illegal collection and usage of personal information by enumerating relevant activities. The six types of illegal collection and usage of personal information include: (i) failing to publish the policy of collection and usage of personal information; (ii) failing to explicitly inform the purpose, method and scope of collect and usage of personal information; (iii) collecting or using personal information without the consent of users; (iv) violating necessity principle, collecting personal information not relevant to the service provided; (v) providing personal information to others without consent of users; (vi) failing to provide deletion or correction functions with respect to personal information as required by law, or failing to publish complain or reporting channels.

Pursuant to the PRC Civil Code (《中華人民共和國民法典》), which was promulgated by the National People's Congress on May 28, 2020, and became effective on January 1, 2021, the personal information of a natural person shall be protected by law. Any organization or individual that needs to collect, use, process, transmit, offer, disclose the personal information of others shall do so in accordance with the law and ensure information security, and may neither illegally collect, use, process or transmit the personal information of others, nor illegally trade, provide or disclose the personal information of others. Anyone whose civil rights and civil interests, including personal information, are infringed upon shall have the right to seek tort liability against the infringer.

On March 12, 2021, the CAC, the MIIT, the MPS and the SAMR jointly issued the Rules on the Scope of Necessary Personal Information for Common Types of Mobile Internet Applications (《常見類型移動互聯網應用程序必要個人信息範圍規定》) (the "Necessary Personal Information Rules"), which came into effect on May 1, 2021. According to the Necessary Personal Information Rules, mobile app operators shall not deny users' access to its basic functions and services on the basis that such user disagrees with the provision of their personal information that is not necessary. The Necessary Personal Information Rules further provide relevant scopes of necessary personal information for different types of mobile apps.

On August 20, 2021, the SCNPC promulgated the Personal Information Protection Law (《個人信息保護法》), which took effect on 1 November 2021. The Personal Information Protection Law requires, among others, that (i) the processing (including the collection, storage, use, processing, transmission, provision, disclosure and deletion) of personal information shall be processed following the principles of lawfulness, legitimacy, necessity and good faith, and shall not be processed through misleading, fraudulent, coercive and other means, (ii) the processing of personal information should have a clear and reasonable purpose which should be directly related to the processing purpose, in a method that has the least impact on personal rights and interests, and the collection of personal information should be limited to the minimum scope necessary to achieve the processing purpose to avoid the

excessive collection of personal information. Entities processing personal information bear responsibilities for their activities of processing personal information, and shall adopt necessary measures to safeguard the security of the personal information that they process.

Regulations of Intellectual Property Rights

Patent

The Patent Law of the PRC (《中華人民共和國專利法》) (the "Patent Law") is revised by the SCNPC on October 17, 2020 and came into effect on June 1, 2021. According to the current Patent Law, when the invention or utility model patent is granted, unless otherwise stipulated in the Patent Law, without the approval of the patent owner, no entity or person shall implement the relevant patent, that is, manufacture, use, offer to sell, sell or import the patented products for business purpose, or use the patented method and use, offer to sell, sell or import the products directly obtained with the patented method. Implementing the patent without the approval of the patent owner constitutes the infringement of patent rights. Any dispute in connection with this shall be resolved by the relevant parties through negotiation. If the relevant parties refuse to negotiate or the negotiation fails, the patent owner or the relevant stakeholders may file a lawsuit in the people's court or turn to the patent administration authorities for handling.

Copyright

Copyright in the PRC, including copyrighted software, is principally protected under the Copyright Law of the PRC (《中華人民共和國著作權法》) and related rules and regulations. Under the Copyright Law of the PRC, the term of protection for copyrighted software is 50 years. On November 11, 2020, the SCNPC promulgated the newly amended Copyright Law, or the New Copyright Law, which took effect on June 1, 2021. The New Copyright Law increased the cost of infringement violations and expanded the protection coverage of Copyright Law. The Regulation on the Protection of the Right to Communicate Works to the Public over Information Networks (《信息網絡傳播權保護條例》), which was most recently amended on January 30, 2013, provides specific rules on fair use, statutory license, and a safe harbor for use of copyrights and copyright management technology and specifies the liabilities of various entities for violations, including copyright holders, libraries and Internet service providers. In order to further implement the Regulations for the Protection of Computer Software (《計算機軟件保護條例》) promulgated by the State Council on June 4, 1991 and last amended on January 30, 2013, the State Copyright Bureau issued the Registration of Computer Software Copyright Procedures (《計算機軟件著作權登記辦法》) on April 6, 1992 and last amended on June 18, 2004 and became effective on July 1, 2004, which applies to software copyright registration, license contract registration and transfer contract registration with respect to software copyright.

Trademark

Registered trademarks are protected under the Trademark Law of the PRC (《中華人民共和國商標法》) which became effective in 1983 and was most recently amended on April 23, 2019 and effective on November 1, 2019 as well as related rules and regulations. Trademarks are registered with the Trademark Office of China National Intellectual Property Administration (國家知識產權局). Where registration is sought for a trademark that is identical or similar to another trademark which has already been registered or given preliminary examination in the same or similar category of commodities or services, the application for registration of this trademark may be rejected. Trademark registrations are effective for a renewable ten-year period, unless otherwise revoked.

Domain Name

Domain names are protected under the Administrative Measures on Internet Domain Names (《互聯網域名管理辦法》) promulgated by the Ministry of Industry and Information Technology, or MIIT on August 24, 2017 and effective as of November 1, 2017. Domain name registrations are handled through domain name service agencies established under the relevant regulations, and applicants become domain name holders upon successful registration. The domain name registration also follows the principle of "first file, first registration".

Tax Regulations

Enterprise Income Tax

According to the Enterprise Income Tax Law of the PRC (《中華人民共和國企業所得税法》) promulgated by the National People's Congress on March 16, 2007, last amended on December 29, 2018, and effective on the same day, and the Implementation Regulations for 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》) promulgated by the State Council on December 6, 2007, last amended on December 6, 2024, and implemented from January 20, 2025, enterprises (including foreign-invested enterprises) in China are subject to a uniform enterprise income tax rate of 25%. However, high-tech enterprises that require key support from the state are subject to a reduced enterprise income tax rate of 15%, and eligible small and micro enterprises are subject to a reduced enterprise income tax rate of 20%.

Value Added Tax

Pursuant to the Value-added Tax Law of the PRC (《中華人民共和國增值税法》), which was promulgated by Standing Committee of the National People's Congress on December 25, 2024 and effective from January 1, 2026, and the Regulations for the Implementation of the Value-Added Tax Law of the People's Republic of China (《中華人民共和國增值税法實施條例》) which was promulgated by the State Council on December 25, 2025 and effective from January 1, 2026, all entities or individuals in the PRC engaged in the sale of goods, processing

services, repair and replacement services, and the provision of services, sales of intangible assets, real estate and importation of goods are required to pay value-added tax (VAT). Unless otherwise provided, taxpayers engaged in provision of services and sales of intangible assets are subject to a tax rate of 6%.

According to the Notice on Implementing the Pilot Program of Replacing Business Tax with Value-Added Tax in an All-round Manner (Cai Shui [2016] No. 36) (《關於全面推開營業税改徵增值税試點的通知》(財税[2016]第36號)) promulgated by the MOF and the SAT promulgated on March 23, 2016 and effective from May 1, 2016, and amended on July 11, 2017, March 20, 2019, November 12, 2024 and October 17, 2025, with the approval of the State Council, as of May 1, 2016, the pilot program of replacing business tax with VAT shall be implemented across the country, all business tax taxpayers in the construction industry, the real estate industry, the financial industry, and the living service industry shall be included in the scope of the pilot program, and the payment of business tax shall be replaced by the payment of VAT. According to the Circular on Policies for Simplifying and Consolidating Value-added Tax Rates (Cai Shui [2017] No. 37) (《關於簡併增值税税率有關政策的通知》(財税[2017]37號)), announced by the MOF and the SAT on April 28, 2017, and effective from July 1, 2017, the structure of value-added tax rates will be simplified from July 1, 2017, and the 13% VAT rate will be cancelled. The scope of goods with 11% tax rate and the provisions for deducting input tax are specified.

According to the Circular on Adjusting Value-added Tax Rates of Ministry of Finance and the State Administration of Taxation (Cai Shui [2018] No. 32) (《財政部、國家税務總局關於調整增值税税率的通知》(財税[2018]32號)) announced by the MOF and the SAT on April 4, 2018 and effective on May 1, 2018, from May 1, 2018, where a taxpayer engages in a taxable sales activity for the value-added tax purpose or imports goods, the previous applicable 17% and 11% tax rates are adjusted to be 16% and 10% respectively.

According to the Announcement on Relevant Policies for Deepening Value-Added Tax Reform (Announcement of the Ministry of Finance of the PRC, the State Taxation Administration and the General Administration of Customs of the PRC [2019] No. 39) (《關於深化增值税改革有關政策的公告》(財政部、税務總局、海關總署公告2019年第39號)) announced by the Ministry of Finance, the SAT, and the General Administration of Customs on March 20, 2019 and effective from April 1, 2019, amended on August 22, 2025 and effective from September 1, 2025, with respect to VAT taxable sales or imported goods of a VAT general taxpayer, the originally applicable VAT rate of 16% shall be adjusted to 13%; the originally applicable VAT rate of 10% shall be adjusted to 9%.

Regulations of Labor Protection

Labor Protection

Pursuant to the Labor Law of the PRC (《中華人民共和國勞動法》), promulgated by SCNPC on July 5, 1994 and amended and effective on December 29, 2018 and the Labor Contract Law of the PRC (《中華人民共和國勞動合同法》) amended by SCNPC and effective

on July 1, 2013 and the Implementation Rules of the Labor Contract Law of the PRC (《中華人民共和國勞動合同法實施條例》) promulgated by the State Council and effective on September 18, 2008, employers shall establish and improve labor rules and regulations according to the laws and regulations and shall strictly comply with the national standards, provide trainings to their employees, protect their labor rights and perform their labor obligations. Employers shall execute written labor contracts with full-time employees. Labor contracts shall be categorized into labor contracts with fixed term, labor contracts without fixed term and labor contracts to be expired upon completion of certain tasks. All employers must comply with local minimum wage standards.

Social Insurance and Housing Provident Fund

In addition, according to the Social Insurance Law of the PRC (《中華人民共和國社會保險法》) promulgated by SCNPC on October 28, 2010, amended and came into effect on December 29, 2018, the Regulations on the Administration of Housing Provident Funds (《住房公積金管理條例》) amended by the State Council and came into effect on March 24, 2019, the Provisional Regulations on Collection and Payment of Social Insurance Premiums (《社會保險費徵繳暫行條例》) amended by the State Council and came into effect on March 24, 2019, the Regulations on Work-related Injury Insurance (《工傷保險條例》) amended by the State Council on December 20, 2010 and took effect on January 1, 2011, the Provisional measures for Maternity Insurance for Enterprise Employees (《企業職工生育保險試行辦法》) promulgated by the Ministry of Labour (at that time) on December 14, 1994 and took effect on January 1, 1995 and the Unemployment Insurance Regulations (《失業保險條例》) promulgated by the State Council on January 22, 1999 and effective on the same day, employers in the PRC shall pay premium for basic pension insurance, unemployment insurance, maternity insurance, work-related injury insurance, basic medical insurance and housing provident funds for its employees at the applicable rates based on the amounts stipulated by the laws.

The national medical insurance program was first adopted according to the Decision of the State Council on the Establishment of the Urban Employee Basic Medical Insurance Program (《國務院關於建立城鎮職工基本醫療保險制度的決定》) issued by the State Council on December 14, 1998, under which all urban employers and their employees are required to enroll in the basic medical insurance program and the basic medical insurance premiums are jointly contributed by the employers and employees. On July 10, 2007, the State Council issued the Guiding Opinions of the State Council on Launching the Pilot Urban Resident Basic Medical Insurance (《國務院關於開展城鎮居民基本醫療保險試點的指導意見》), further enlarging the coverage of the basic medical insurance program, under which urban residents who are not employed in the pilot district may voluntarily join the Urban Resident Basic Medical Insurance. In addition, on January 3, 2016, the Opinions of the State Council on Integrating the Basic Medical Insurance Systems for Urban and Rural Residents (《國務院關於整合城鄉居民基本醫療保險制度的意見》) issued by the State Council required the integration of the urban resident basic medical insurance and the new rural cooperative medical

care system and the establishment of a unified basic medical insurance system for urban and rural residents, which will cover all urban and rural residents other than rural migrant workers and persons in flexible employment arrangements who participate in the basic medical insurance for urban employees.

Program participants are eligible for full or partial reimbursement of the cost of medicines included in the medical insurance catalog. The Notice Regarding the Tentative Measures for the Administration of the Scope of Basic Medical Insurance Coverage for Pharmaceutical Products for Urban Employees (《關於印發城鎮職工基本醫療保險用藥範圍管理暫行辦法的通知》) (the "Medical Insurance Notice") jointly issued on May 12, 1999 by several authorities including, among others, the Ministry of Labour and Social Security and the Ministry of Finance, provides that a pharmaceutical product listed in the medical insurance catalog must be clinically necessary, safe, effective, reasonably priced, easy to use, available in sufficient quantity in the market, and must meet one of the following requirements: (1) be set forth in the Pharmacopoeia of the PRC, (2) satisfy the standards promulgated by the NMPA, and (3) be approved by the NMPA for imported pharmaceutical products.

On July 31, 2025, the Supreme People's Court of the PRC issued the Interpretation II by the Supreme People's Court of the PRC on Legal Issues 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)》) (the "Interpretation II"), which took effect from September 1, 2025. Pursuant to the Interpretation II, the provision in a labor contract, agreed upon between an employer and an employee, or the employee's commitment to the employer, stipulating that social insurance contributions need not be paid, shall be deemed invalid by the people's court. If an employer fails to pay social insurance contributions in accordance with the law, and the employee requests to terminate the labor contract and demands the employer to pay economic compensation pursuant to Article 38(3) of the Labor Contract Law, the people's court shall support such a request in accordance with the law.

Regulations on Commodity Housing Tenancy

According to the PRC Civil Code, an owner of immovable or movable property is entitled to possession, use, earnings, and disposal of such property in accordance with the law. Subject to the consent of the lessor, the lessee may sublease the leased premises to a third party. Where a lessee subleases the premises, the lease contract between the lessee and the lessor remains valid. The lessor is entitled to terminate the lease if the lessee subleases the premises without the consent of the lessor. In addition, if the ownership of the leased premises changes during the lessee's possession in accordance with the terms of the lease contract, the validity of the lease contract shall not be affected. Moreover, pursuant to the Civil Code, if the mortgaged property has been leased and transferred for occupation prior to the establishment of the mortgage right, the original tenancy shall not be affected by such mortgage right.

On December 1, 2010, the Ministry of Housing and Urban-Rural Development promulgated the Administrative Measures on Leasing of Commodity Housing (《商品房屋租賃管理辦法》), which became effective on February 1, 2011. According to such measures, the

lessor and the lessee are required to complete property leasing registration and filing formalities within 30 days from execution of the property lease contract with the development authorities or real estate authorities of the municipality or county where the leased property is located. If a company fails to do as aforesaid, it may be ordered to rectify within a stipulated period, and if such company fails to rectify, a fine ranging from RMB1,000 to RMB10,000 may be imposed on each lease agreement.

According to the Interpretation of the Supreme People's Court on Several Issues concerning the Application of Law in the Trial of Cases about Disputes Over Lease Contracts on Urban Buildings (2020 version) (《最高人民法院關於審理城鎮房屋租賃合同糾紛案件具體應用法律若干問題的解釋(2020修正)》), which took effect on January 1, 2021, if the ownership of the leased premises changes during lessee's possession in accordance with the terms of the lease contract, and the lessee requests the assignee to continue to perform the original lease contract, the PRC court shall support it, except that the mortgage right has been established before the lease of the leased premises and the ownership changes due to the mortgagee's realization of the mortgage right.

Regulations on Anti-Unfair Competition and Anti-Commercial Bribery

According to the Anti-Unfair Competition Law of the PRC (《中華人民共和國反不正當競爭法》) promulgated by SCNPC, as amended on June 27, 2025 and effective as of October 15, 2025 and the Interim Provisions on the Prohibition of Commercial Bribery (《關於禁止商業賄賂行為的暫行規定》) promulgated by the State Administration for Industry and Commerce, or SAIC (now SAMR), on November 15, 1996, the business operator shall not provide or promise to provide economic benefits (including cash, other property or by other means) to a counter-party in a transaction or a third party that may be able to influence the transaction, in order to entice such party to secure a transactional opportunity or competitive advantages for the business operator. Any business operator breaching the relevant anti-bribery rules above-mentioned may be subject to administrative punishment or criminal liability depending on the seriousness of the cases.

Regulation of Foreign Exchange and Dividend Distribution

The principal regulations governing foreign currency exchange in China are the Regulations on Foreign Exchange Administration of the PRC (《中華人民共和國外匯管理條例》), or the Foreign Exchange Regulations, promulgated by the State Council on January 29, 1996 and latest revised and effective on August 5, 2008. Under the Foreign Exchange Regulations and other PRC rules and regulations on a currency conversion, Renminbi is freely convertible for payments of current account items, such as trade and service-related foreign exchange transactions and dividend payments, but not freely convertible for capital account items, such as direct investment, loan or investment in securities outside China unless prior approval of the State Administration of Foreign Exchange of the People's Republic of China (國家外匯管理局) (the "SAFE") or its local counterpart is obtained.

The SAFE promulgated the Circular on Further Simplifying and Improving Foreign Exchange Administration Policies in Respect of Direct Investment (《關於進一步簡化和改進直接投資外匯管理政策的通知》) (the "SAFE Circular 13") on February 13, 2015, which was amended on December 30, 2019, and prescribed that the bank instead of SAFE can directly handle the foreign exchange registration and approval under foreign direct investment while SAFE and its branches indirectly supervise the foreign exchange registration and approval under foreign direct investment through the bank.

The SAFE promulgated the Circular on Reforming the Management Approach regarding the Settlement of Foreign Capital of Foreign-invested Enterprise (《關於改革外商投資企業外匯資本金結匯管理方式的通知》) (the "SAFE Circular 19") on March 30, 2015, which was last amended on March 23, 2023, and further issued the Circular on Reforming and Standardizing the Foreign Exchange Settlement Management Policy of Capital Account (《關於改革和規範資本項目結匯管理政策的通知》) (the "SAFE Circular 16") on June 9, 2016, which was last amended on December 4, 2023. Pursuant to the SAFE Circular 19 and the SAFE Circular 16, the flow and use of the Renminbi capital converted from foreign currency denominated registered capital of a foreign-invested company shall not be used for business beyond its business scope, or to provide loans to persons other than affiliates unless otherwise permitted under its business scope.

On October 23, 2019, the SAFE released the Circular on Further Promoting Cross-border Trade and Investment Facilitation (《關於進一步促進跨境貿易投資便利化的通知》), which was amended on December 4, 2023. The Circular allows non-investment foreign-invested enterprises to use their capital funds to make equity investments in China, provided that such investments do not violate the negative list and the target investment projects are genuine and in compliance with laws.

According to the Circular on Optimizing Administration of Foreign Exchange to Support the Development of Foreign-related Business (《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, under the prerequisite of ensuring true and compliant use of funds and compliance and complying with the prevailing administrative provisions on use of income from capital projects, enterprises which satisfy the criteria are allowed to use income under the capital account, such as capital funds, foreign debt and overseas listing, etc., for domestic payment, without the need to provide proof materials for veracity to the bank beforehand for each transaction.

Regulation of Outbound Investment

Pursuant to the Measures for the Administration of Outbound Investment (《境外投資管理辦法》) issued by the Ministry of Commerce on March 16, 2009, modified on September 6, 2014, and implemented on October 6, 2014, the Ministry of Commerce and the provincial competent authorities of commerce shall subject the outbound investments of enterprises to filing or approval management, depending on the actual circumstances of such investments.

Outbound investments of enterprises involving sensitive country or region, or sensitive industry shall be subject to approval. Outbound investment of enterprises in other circumstances is subject to record-filing management.

According to the Measures for the Administration of Outbound Investment, after an enterprise's outbound investment has been filed or approved, if there is a change to the outbound investment matters specified in the original certificate, the enterprise shall go through the change procedures with the Ministry of Commerce or the provincial-level commerce department in charge of the original filing or approval. If an enterprise terminates an outbound investment that has been filed or approved, it shall, after going through procedures such as deregistration in accordance with the law of the investment destination, report to the Ministry of Commerce or the provincial-level commerce department in charge of the original filing or approval. The Ministry of Commerce or the provincial-level commerce department in charge of the original filing or approval will issue a confirmation letter of cancellation based on the report.

Pursuant to the Administrative Measures for the Outbound Investments of Enterprises (《企業境外投資管理辦法》) issued by the NDRC on December 26, 2017 and effective from March 1, 2018, PRC enterprises (the "Investor") intending to make outbound investments shall go through the formalities, such as approval or filing, for the outbound investment project (the "Project"), report relevant information, and cooperate in the supervisory inspections. The scope subject to approval management includes sensitive projects carried out directly by the Investor or through its controlled foreign enterprises; the scope subject to filing management includes non-sensitive projects carried out directly by the Investor, which involve the direct contribution of assets, rights and interests, or provision of financing or guarantee by the Investor. The Catalogue of Sensitive Sectors for Outbound Investment (2018 Edition) (《境外投資敏感行業目錄(2018年版)》) issued by the NDRC on January 31, 2018 and effective from March 1, 2018 lists in detail the sensitive sectors.

According to the Administrative Measures for the Outbound Investments of Enterprises, for the approved or filed projects, in the event of any of the following circumstances, the investor shall, prior to the occurrence of the relevant circumstances, apply to the authority that issued the approval document or filing notice for the project for approval of the change: (1) An increase or decrease in the number of investors; (2) significant changes in the location of investment; (3) significant changes in the main content and scale; (4) Where the change in the Chinese investment amount reaches or exceeds 20% of the originally approved or recorded amount, or where the change in the Chinese investment amount is US$100 million or more; (5) Other circumstances requiring major adjustments to the relevant content of the project approval document or filing notice.

According to the Foreign Exchange Administration Regulations of the PRC (《中華人民共和國外匯管理條例》) and the Provisions on the Foreign Exchange Administration of Overseas Direct Investment by Domestic Institutions (《境內機構境外直接投資外匯管理規定》) issued by the SAFE on July 13, 2009 and implemented as of August 1, 2009, domestic institutions making direct investments overseas shall register in accordance with the

regulations of the foreign exchange administration department under the State Council. In the event of a registered foreign enterprise increasing or reducing its capital, transferring or replacing its shares, etc., the domestic institution shall go through the formalities for changing the foreign exchange registration of direct investment abroad.

Regulation of Overseas Listing and Full Circulation

CSRC Record-Filing Requirements for Overseas Issuance and Listing

On February 17, 2023, the China Securities Regulatory Commission (the "CSRC") promulgated the Trial Administrative Measures of Overseas Securities Offering and Listing by Domestic Companies (《境內企業境外發行證券和上市管理試行辦法》) and five supporting Guidelines (collectively, the "Overseas Listing Trial Measures"), which took effect on March 31, 2023. The Overseas Listing Trial Measures comprehensively reformed the current regulatory system for the overseas issuance and listing of securities by Chinese enterprises, and adopted a filing based regulatory system to regulate the direct and indirect overseas issuance and listing of securities by Chinese enterprises.

According to the Overseas Listing Trial Measures, domestic enterprises directly issuing and listing securities overseas shall file with the CSRC in accordance with the Measures, submit filing reports, legal opinions and other relevant materials, and truthfully, accurately, and completely explain shareholder information and other circumstances. Domestic enterprises that submit an application for initial public offering and listing to overseas securities regulatory authorities shall file with the CSRC within 3 working days after submitting the application documents. The Measures also provide that where a significant event such as a change in control, voluntary termination of listing or compulsory termination of listing occurs after the issuer's overseas issuance and listing, the issuer shall report the specific circumstances to the CSRC. If the issuer fails to complete the filing or conceals any material facts or tampers with any material contents in its filing materials, it will be subject to administrative penalties such as being ordered to make corrections, given a warning and fined. Its controlling shareholders, de facto controllers, directly responsible officers and others directly responsible will also be subject to administrative penalties.

Regulations on Full Circulation

"Full circulation" refers to the listing and circulation of unlisted domestic shares of H-share companies (including unlisted domestic shares held by domestic shareholders prior to the overseas listing, unlisted domestic shares issued in China after the overseas listing and unlisted shares held by foreign shareholders) on the Stock Exchange of Hong Kong Limited.

On November 14, 2019, the CSRC issued the Guidelines on Application for "Full Circulation" of Domestic Unlisted Shares of H-Share Companies (《H股公司境內未上市股份申請「全流通」業務指引》) (CSRC Announcement [2019] No. 22), and on August 10, 2023,

it made the latest amendments to it and issued the Guidelines on Application for "Full Circulation" of Domestic Unlisted Shares of H-Share Companies (Revision 2023) (《H股公司境內未上市股份申請「全流通」業務指引(2023修訂)》) (the "Full Circulation Guidelines").

According to the Full Circulation Guidelines, subject to relevant laws and regulations, state owned assets management, foreign investment and industry regulation policies, shareholders of domestic unlisted shares may independently negotiate to determine the number and proportion of shares applied for circulation, and entrust H-share companies to file with the CSRC. Domestic joint stock companies that have not yet been listed may file a record with the CSRC for "Full Circulation" upon initial public offering and listing overseas. Shareholders of domestic unlisted Shares shall, in accordance with the relevant business rules of China Securities Depository and Clearing Corporation Limited (the "CSDC"), handle the re-registration of Shares, and in accordance with the relevant provisions of the Hong Kong market, handle the registration of Shares and other procedures, and shall make disclosure of information in accordance with the laws and in a compliant manner. After the domestic unlisted Shares are circulated on the Hong Kong Stock Exchange, they may not be transferred back to the mainland. Shareholders of domestic unlisted shares may reduce and increase their holdings of the Company's shares traded on the Hong Kong Stock Exchange in accordance with the relevant business rules. The H Share Company shall submit a report on the relevant circumstances to the CSRC within 15 days of the completion of the re-registration of the shares involved in the application with CSDC.

On December 31, 2019, the CSDC and Shenzhen Stock Exchange jointly issued the Implementation Measures for H-share "Full Circulation" Business (《H股「全流通」業務實施細則》), which applied to the cross-border re-registration, custody, maintenance of holding details, transaction entrustment and instruction transmission, settlement, management of settlement participants, services of nominee holders and other services in relation to H-share "Full Circulation" business.

On February 7, 2020, the China Securities Depository and Clearing (Hong Kong) Company Limited (the "CSDC Hong Kong") issued the Guide of China Securities Depository and Clearing (Hong Kong) Company Limited to the Program for Full Circulation of H-shares (《中國證券登記結算(香港)有限公司H股「全流通」業務指南》), which specified the custody, depository, nominee services, settlement arrangement and other relevant business by the CSDC Hong Kong. The guide was modified and updated on September 20, 2024, with the updated version coming into effect on September 23, 2024.

On February 7, 2020, the CSDC released the Guide to the Program for Full Circulation of H-shares (《H股「全流通」業務指南》), detailing business preparations, account arrangements, cross-border re-registrations, overseas centralized custody, and other services. On September 20, 2024, China Securities Depository and Clearing Corporation Shenzhen Branch released the H Shares "Full Circulation" Business Guide of China Securities Depository and Clearing Corporation Limited Shenzhen Branch (《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》), which superseded the H Shares "Full Circulation" Business Guide issued by the CSDC.

CSRC Regulations on Confidentiality and File Management for Overseas Issuance and Listing

On February 24, 2023, the CSRC, the Ministry of Finance, the National Administration of State Secrets Protection, and the National Archives Administration of China jointly issued the modified Provisions on Strengthening Confidentiality and Archives Administration of Overseas Securities Offering and Listing by Domestic Companies (《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》) (the "Provisions on Archives Administration"), which came into effect on March 31, 2023. The Provisions on Archives Administration shall apply to joint stock companies incorporated in China with direct overseas issuance and listing, and domestic operating entities of subjects with indirect overseas issuance and listing (collectively referred to as "the domestic enterprises").

According to the Provisions on Archives Administration, domestic enterprises shall establish and implement a sound confidentiality and archive management system. If a domestic enterprise decides to disclose documents or materials involving state secrets, state organs' work secrets, or other documents and materials that will adversely affect national security or public interests if leaked, it shall apply for approval to the competent department with approval authority according to the laws, and report to the confidentiality administrative department at the same level for the record. After approval by the governmental authorities, the domestic enterprise as the party making the disclosure of information and the securities company and securities service institution as the party receiving the information shall sign a confidentiality agreement, which shall clearly specify the confidentiality obligations and liabilities assumed by the relevant securities companies, securities service institutions, etc. Domestic companies must also provide a written statement outlining their compliance with relevant regulatory requirements and procedures when providing the above information they retain to securities companies and securities services institutions. According to the Provisions on Archives Administration, the provision of accounting archives or copies of accounting archives to relevant securities companies, securities services, overseas regulatory authorities and other entities and individuals shall be subject to the relevant national regulations and procedures.