OVERVIEW

Our business in the PRC is subject to extensive supervision and regulatory control by the PRC government. This section sets out a summary of relevant laws and regulations that may have material impact on our business.

Industrial policies for the intelligent rail transit industry

Pursuant to the "Outline of the Planning for a National Comprehensive Three-dimensional Transportation Network" issued by the Central Committee of the Communist Party of China and the State Council on February 24, 2021, China will enhance the level of intelligent development. To accelerate the improvement of transportation science and technology innovation capabilities and promote the digitalization and networking of transportation infrastructure. To establish a high-precision transportation geographic information platform and accelerate the independent innovation and application of building information modeling technology in various fields. To comprehensively lay out the traffic perception system, carry out its planning and construction synchronously with the transportation infrastructure, deploy active early warning facilities in key areas, and improve multi-dimensional monitoring, precise control and collaborative service capabilities. To utilize new technologies to empower the development of transportation infrastructure, strengthen the quality enhancement and upgrade of existing transportation infrastructure, and improve facility utilization efficiency and service levels. To utilize modern control technology to improve the intelligence level of train dispatching and transportation management of the entire railway network. To promote the intelligence of highway network management and travel information services, and to improve road traffic monitoring equipment and supporting networks.

The "Long and Medium-Term Development Plan Outline for Scientific and Technological Innovation in the Transportation Sector (2021-2035)" jointly issued by the Ministry of Transport and the Ministry of Science and Technology on January 24, 2022, has proposed the promotion of upgrading of fast, convenient and intelligent travel technologies. These include developing technologies for intelligent perception/monitoring and analysis of travel behavior, forecasting holiday road passenger demand, optimizing the layout and reconstruction of transportation service facilities, making transportation service processes transparent and providing intelligent monitoring and early warning, and monitoring, evaluating, and regulating traffic flow. Breakthroughs will be achieved in the design of intelligent, coordinated, and integrated railway transportation services and new types of railway transportation organization. To improve the technical level of comprehensive management of urban traffic congestion, promote the coordinated development of intelligent transportation and intelligent cities, with breakthroughs in urban traffic demand forecasting and assessment simulation, traffic operation status perception, multi-agent simulation and decision-making in urban transportation, and data-driven traffic congestion control and guidance. The application of next-generation information technology will be promoted in the coordinated development of transportation and cities, optimizing urban public transportation network layout and precise vehicle scheduling, as well as dynamic operation monitoring, thereby improving the intelligent management of urban transportation through "holographic perception + coordinated linkage + dynamic optimization + precise regulation."

Pursuant to the "Guiding Opinions of the Ministry of Housing and Urban-Rural Development on Comprehensively Promoting the Construction of an Integrated Urban Transportation System" issued by the Ministry of Housing and Urban-Rural Development on November 27, 2023, the Ministry encourages the exploration and development of monitoring platforms that integrate data on urban roads, rail transit, charging piles, parking facilities and other facilities, as well as urban commuting and transit-oriented development (TOD) models, promoting the interconnection and sharing of various data resources and enhance the digitalization, standardization and intelligentization of urban transportation infrastructure construction and operation. To promote the deep integration of urban transportation infrastructure monitoring platforms with urban operation management service platforms and the City Information Model (CIM) foundational platform. The evaluation functions of urban transportation infrastructure monitoring platforms will be improved, and monitoring and evaluation results will be actively utilized to assist decision-making in the construction, operation, and management of urban transportation infrastructure.

The Measures for the Management of Graded Control of Operational Safety Risks and Hidden Danger Investigation and Governance in Urban Rail Transit (2024 Revision) issued by the Ministry of Transport on November 9, 2024 proposes that the competent operation authorities and operating units of urban rail transit should rely on intelligent management systems to realize information management and information sharing of risk grading control and hidden danger investigation and management, so as to improve the level of operation safety management.

Industrial policies for the intelligent city governance industry

The "Opinions of the Central Committee of the Communist Party of China and the State Council on Promoting High-Quality Urban Development", issued by the Central Committee of the Communist Party of China and the State Council on August 15, 2025, calls for the advancement of intelligent and refined urban governance. To promote comprehensive digital transformation across cities, establish a unified, data-integrated and highly efficient digital foundation for urban development while enhancing the City Information Modeling (CIM) platform. To deepen data resource development and multi-scenario applications, propel the implementation of "one-stop online services" for government affairs, "integrated online management" for urban operations, and "universal online access" to public services. To strengthen urban construction archives management and digital infrastructure, enhance grid-based governance mechanisms, advance the reform of small and micro urban public spaces, treat and enhance the environment in back streets and alleys, as well as in front of and behind houses.

Pursuant to the Urban Standardization Action Plan jointly issued by the National Standards Committee, the Ministry of Industry and Information Technology, the Ministry of Civil Affairs, the Ministry of Ecology and Environment, the Ministry of Housing and Urban-Rural Development, and the Ministry of Emergency Management on September 14, 2023, it is encouraged to deepen the utilize of new generation information technologies such as cloud computing, the Internet of Things, big data and artificial intelligence to empower intelligent city construction, develop key technical standards such as intelligent city classification and grading, intelligent infrastructure transformation, data governance, urban brain and urban digital twins, improve standards for typical application areas such as intelligent elderly care, intelligent parks, intelligent communities and intelligent transportation, deepen the implementation and application of intelligent city standards in urban governance, planning and construction, industrial economy, public services, ecological environment, etc., and promote the coordinated construction of intelligent city and digital rural standards.

The "Guiding Opinions on Deepening Intelligent City Development and Promoting Urban Digital Transformation" jointly issued by the National Development and Reform Commission, the National Data Administration, MOF, and the Ministry of Natural Resources on May 14, 2024 propose promoting data integration across all aspects of urban planning, construction, management and operations, strengthening urban vital sign monitoring, and promoting data-empowered and business-linked urban health checks and urban renewal. Rely on intelligent hubs for urban operations and governance, integrate functions such as status perception, modeling and analysis, urban operations and emergency command, bringing together areas such as public safety, planning and construction, urban management, emergency communications, traffic management, market supervision, ecological environment and public sentiment awareness. This will enable comprehensive situational awareness, intelligent trend analysis, coordinated and efficient handling, agile dispatching response and rapid switching between normal and emergency situations. To explore integrated intelligent governance systems at the grassroots level will accelerate the on-demand and compliant return of high-frequency data to the basic level, building an application service system where data from the basic level could be effectively accumulated and quickly shared, promoting business collaboration and cross-functional linkage. To strengthen the construction of a credit system covering urban natural person and legal person, promote the collection, processing and application of credit information, and explore the establishment of a management closed loop of credit commitments, credit-keeping incentives, credit-breaking penalties, and credit repair for urban digital service providers in accordance with laws and regulations.

Industrial policies for enterprise digital transformation and upgrading

Pursuant to the "Notice of the Ministry of Industry and Information Technology, MOF, the People's Bank of China and the State Administration of Financial Supervision on the Issuance of the 'Special Action Plan for Digital Empowerment of Small and Medium-sized Enterprises (2025-2027)'" issued on December 12, 2024, China will promote the organic integration of digital transformation of small and medium-sized enterprises ("**SME**") and the implementation of large-scale equipment upgrades and technological transformation and upgrading projects. Leveraging pilot cities for digital transformation of SMEs as a starting point, promote digital transformation by combining "points, lines, and areas", accelerating AI innovation application and deep empowerment, fully activate the value of data factors, focus on improving supply quality, efficiency, and service safeguard levels, and implementing the action plan for empowering SMEs through digitalization. High-quality enterprises in the digital economy will be cultivated and strengthened. Leading enterprises' digital teams will be encouraged to export services externally, promoting the deep integration of existing industrial internet platforms with vertical industries. A group of industry-specific and scenario-based service providers with deep knowledge accumulation and high-quality service capabilities in specific industries and fields will be cultivated. To foster new momentum with digitalization, and promote new development with new momentum, to encourage small and medium-sized enterprises to increase their entrepreneurial and innovative efforts in digital fields such as 5G, artificial intelligence, industrial software and industrial internet platforms, focusing on cultivating a group of specialized, innovative, and innovative SMEs and "little giants".

Pursuant to the "Implementation Plan for the Digital Transformation of the Electronic Information Manufacturing Industry" issued by the Ministry of Industry and Information Technology, the National Development and Reform Commission, and the National Data Administration on April 22, 2025, it is encouraged to develop and promote solutions such as modular development model management, digital transformation model mapping, industry digital service provider capability evaluation, multi-heterogeneous data security assessment technology, integrated manufacturing planning systems and industry digital transformation service platforms for sub-sectors such as intelligent security, industrial control systems, automotive electronics, marine electronics, avionics and medical electronics. Digital transformation service providers are to be cultivated. To encourage digital transformation service providers in the electronic information manufacturing industry to establish a full-stack service capability encompassing "consulting and planning + path planning + implementation supervision + follow-up evaluation," improve the level of service provision throughout the entire process, and cultivate a group of scenario-based service providers, high-level system integration service providers, and one- stop digital service providers for global expansion.

The Interim Measures for the Management of Generative AI Services (the "**Interim Generative AI Regulation**") was published on July 10, 2023 and came into effect on August 15, 2023. These measures apply to the use of generative AI technologies to provide the public within the territory of the PRC with services generating text, images, audio, video and other content, and primarily regulate data training and labeling activities as well as the provision of generative AI services. Under the Interim Generative AI Regulation, providers of generative AI services that possess public opinion influence or social mobilization capabilities are required to undergo security assessments and complete filing procedures in accordance with relevant national regulations.

With respect to AI technology applications, our Group has independently developed several large models, including PCI Knowledge-Practice TransGPT, Huixing, JiaYiWei, TransCore-V, TransCore-M, and TransCore-TS. Our proprietary large models are primarily used to support the delivery of products and solutions for our intelligent urban rail transit and urban traffic management business scenariosthat is, they are delivered to customers as components of our products and solutions for use according to their specific requirements. Among our proprietary large models PCI Knowledge-Practice TransGPT, Huixing have undergone security assessments in accordance with the Interim Generative AI Regulation, the Basic Security Requirements for Generative AI Services (TC260-003), and other relevant regulations and regulatory requirements. These assessments covered training data source security, training data content security, data labeling security, model security, and the technical and management security measures implemented. According to our PRC Legal Advisor, our Group has completed the generative AI service filing for PCI Knowledge-Practice TransGPT, Huixing, which have been publicly disclosed in the "Filed Generative AI Services Information" published by the Cyberspace Administration of China. Our Group has submitted a filing application for generative AI services for JiaYiWei to the regulatory authorities and has undertaken not to provide JiaYiWei to customers or offer services to the public until the filing is completed. Our Group confirms that among our proprietary large models, TransCore-V, TransCore-M, and TransCore-TS do not involve the application of generative AI technologies. Accordingly, our PRC Legal advisor is of the view that these large models are not subject to the generative AI service filing requirements under the Interim Generative AI Regulation. As of the Latest Practicable Date, our Group confirms and has duly verified that our Group's principal business does not involve providing generative AI services to the public within the PRC as a generative AI service provider.

The Administrative Measures for the Security of Facial Recognition Technology Applications (the "**Facial Recognition Regulation**") was officially promulgated by the Cyberspace Administration of China on March 13, 2025 and came into effect on June 1, 2025. Under the Facial Recognition Regulation, Users of facial recognition technology to handle facial information shall comply with laws and regulations, fulfill obligations of personal information protection, and shall not endanger national security, damage public interests or infringe upon legitimate rights and interests of individuals. Additionally, personal information processors are required to complete filing procedures with the cyberspace administration at or above the provincial level where they are located when the number of stored facial information is processed using facial recognition technology reaches 100,000.

With respect to facial recognition technology applications, our Group does not use facial recognition technology as a personal information processor to provide its principal business services. However, our Group does deliver "passenger information display system operation and maintenance services," "facial recognition modules," and similar components as part of its products and solutions to customers, who then use the corresponding functions according to their own requirements. In such business scenarios, facial recognition information and other related data are processed by the customers themselves. Our Group does not determine the purpose, method, or scope of processing passenger information or facial recognition information, nor does it collect or store such information. Accordingly, our Group is not involved in processing passenger information or facial recognition information as a personal information processor. As of the Latest Practicable Date, our Group confirms that it does not use facial recognition technology as a personal information processor to provide its principal business services, does not store facial information of 100,000 or more individuals using facial recognition technology. According to our PRC Legal Advisor, our Group is not involved in the circumstances requiring the completion of filing procedures under the Facial Recognition Regulation.

Based on the foregoing, the Directors are of the view that the Interim Generative AI Regulation and the Facial Recognition Regulation would not have a material adverse impact on the business of our Group.

COMPANY LAW

Pursuant to the Company Law of the People's Republic of China (the "**Company Law**"), as recently revised by the Standing Committee of the National People's Congress of the People's Republic of China (the "**SCNPC**") on December 29, 2023, and effective July 1, 2024, both limited liability companies and joint stock companies established within the People's Republic of China shall have legal person status. Shareholders of limited liability companies are liable to the company only to the extent of their subscribed capital contributions; shareholders of joint stock companies are liable to the company only to the extent of their subscribed shares. The Company Law shall also apply to foreign-invested enterprises. Where foreign investment laws provide otherwise, such provisions shall prevail.

Laws and regulations in relation to production safety and environmental protection

Production Safety

Pursuant to the "Production Safety Law of the People's Republic of China" latest revised on June 10, 2021 by SCNPC and effective on September 1, 2021, entities engaged in production and business operations within China must meet the work safety conditions stipulated in the Production Safety Law of the People's Republic of China and relevant laws, administrative regulations, and national or industrial standard; those who do not meet these conditions shall not engage in production and business activities. Production and business operation entities should strengthen work safety management, establish and improve a full-staff work safety responsibility system and work safety rules and regulations, increase investment and safeguarding of funds, materials, technology, and personnel for work safety, improve work safety conditions, strengthen work safety standardization and informatization, establish a dual prevention mechanism for safety risk classification management and hidden danger investigation and control, improve risk prevention and mitigation mechanisms, improve work safety standards, and ensure work safety.

Fire Prevention

Pursuant to the "Fire Protection Law of the People's Republic of China" which was newly revised by the SCNPC on April 29, 2021 and took effect on the same day, the emergency management authority of the State Council and its local counterparts at or above county level shall monitor and administer the fire prevention affairs, and the fire prevention design or construction of a construction project must conform to the national fire prevention technical standards.

Pursuant to the "Interim Provisions on the Administration of Fire Protection Design Review and Final Inspection of Construction Projects" revised on August 21, 2023 and implemented on October 30, 2023 by the Ministry of Housing and Urban-Rural Development, special construction projects stipulated in Article 14 of the "Interim Provisions on the Administration of Fire Protection Design Review and Final Inspection of Construction Projects" shall be subject to fire protection design review and fire protection final inspection, and construction projects other than special construction projects that require fire protection design in accordance with national engineering construction fire protection technical standards shall be subject to filing and spot checks of fire protection final inspection.

Laws and regulations in relation to construction enterprise qualifications

Pursuant to the "Construction Law of the People's Republic of China" lastly revised by SCNPC and implemented on April 23, 2019, construction companies, surveying firms, design firms, and project supervision units engaged in construction activities are classified into different qualification levels based on their registered capital, professional and technical personnel, technical equipment and performance of completed construction projects. Only after passing the qualification review and obtaining the corresponding qualification certificate can they engage in construction activities within the scope permitted by their qualification level. Those who undertake projects without obtaining a qualification certificate will be prohibited by the competent authorities and being subjected to a fine; any illegal gains will be confiscated.

Pursuant to the "Regulations on the Administration of Construction Enterprise Qualifications," lastly revised by the Ministry of Housing and Urban-Rural Development and implemented on December 22, 2018, enterprises engaged in new construction, expansion, and renovation of civil engineering, building projects, and line, pipeline, and equipment installation projects must apply for construction enterprise qualifications based on their assets, key personnel, completed projects, and technical equipment; and only after passing the examination and obtaining a construction enterprise qualification certificate could they engage in construction activities within the scope of their qualifications. Enterprises that exceed their qualification level, undertake projects in the name of other enterprises, or allow other enterprises or individuals to undertake projects in their name may be warned, ordered to correct, and fined by the competent authorities.

Pursuant to the "Regulations on the Administration of Construction Engineering Survey and Design Qualifications," revised by the Ministry of Housing and Urban-Rural Development and implemented on December 22, 2018, enterprises engaging in construction engineering survey and design activities within the territory of the People's Republic of China must apply for qualifications based on their assets, professional and technical personnel, technical equipment, and survey and design achievements; and only after passing the examination and obtaining a construction engineering survey and design qualification certificate could they engage in construction engineering survey and design activities. within the scope of their licensed qualifications. If an enterprise no longer meets the corresponding qualification requirements after obtaining engineering survey and design qualifications, the housing and urban-rural development authorities and relevant departments may, upon request from an interested party or acting on their authority, order it to correct the situation within a specified period of time. If it fails to correct the situation within the specified period of time, the licensing authority may revoke its qualifications.

Principal regulations in relation to cybersecurity, data security and personal information protection

In accordance with the Administrative Measures for the Hierarchical Protection of Information Security, which was promulgated and implemented by the Ministry of Public Security, the National Administration of State Secrets Protection, the State Cryptography Administration, and the Informatization Office of the State Council (abolished) on June 22, 2007 and effective on the same day, the security protection level of an information system should be determined based on factors such as the importance of the information system to national security, economic development, and social life, and the degree of harm to national security, social order, the public interest, and the legitimate rights and interests of citizens, legal persons, and other organizations if the information system is sabotaged. Pursuant to these measures, information system security protection levels are divided into five levels. Operators and users of information systems at or above Level 2 must complete filing procedures with the local public security authorities at or above the prefecture-level city within 30 days of the security protection level being determined (for operating/running Level 2 or higher information systems) or within 30 days of the start of operation (for newly built Level 2 or higher information systems).

Pursuant to the Cybersecurity Law of the People's Republic of China, promulgated by the SCNPC on November 7, 2016, effective June 1, 2017, and amended on October 28, 2025 network operators shall fulfill their security protection obligations in accordance with the requirements of the cybersecurity multi-level protection system, safeguarding networks from interference, destruction, or unauthorized access, and preventing network data from being leaked, stolen, or tampered with. Network operators who fail to fulfill their cybersecurity protection obligations under this law may face administrative penalties, including orders to correct violations, warnings, fines, suspension of related operations, suspension for rectification, website closure, revocation of relevant business permits, or revocation of business licenses, depending on the circumstances. If they cause harm to others, they will bear civil liability in accordance with the law; if they constitute violations of public security management, they will be subject to public security management penalties in accordance with the law; and if they constitute a crime, they will be held criminally liable in accordance with the law.

Pursuant to the Data Security Law of the Republic of China promulgated by the SCNPC on June 10, 2021 and effective September 1, 2021, data processing activities shall comply with laws and regulations, establish and improve a full-process data security management system, organize data security education and training, and take appropriate technical measures and other necessary measures to ensure data security. Pursuant to the law, data processing activities conducted using the internet and other information networks must fulfill the aforementioned data security protection obligations based on the network security multi-level protection system. Processors of important data shall clearly identify data security managers and management agencies to ensure data security protection responsibilities. Data processors who fail to fulfill their data security protection obligations under the law may face administrative penalties, including suspension of relevant operations, suspension for rectification, fines, revocation of relevant business permits, or revocation of business licenses, depending on the circumstances. If they cause damage to others, they will bear civil liability in accordance with the law. If their actions constitute a violation of public security management, they will be subject to public security management penalties in accordance with the law; and if their actions constitute a crime, they will be held criminally liable in accordance with the law.

Pursuant to the Personal Information Protection Law of the People's Republic of China promulgated by the SCNPC on August 20, 2021 and implemented on November 1, 2021, personal information processors shall take effective measures to ensure that personal information processing activities comply with the provisions of laws and administrative regulations based on the purpose, method, type of personal information, impact on personal rights and interests, possible security risks, etc. of personal information processing, and prevent unauthorized access and leakage, tampering, and loss of personal information. If a personal information processor fails to fulfill the personal information protection obligations stipulated in this law, it may face administrative liabilities such as orders to correct, warnings, confiscation of illegal gains, fines, orders to suspend relevant business or suspend business for rectification, notification to relevant competent authorities to revoke relevant business permits or revoked business licenses, depending on different circumstances; if the processing of personal information infringes upon personal information rights and interests and causes damage, and the personal information processor cannot prove that it has no fault, it shall bear tort liability such as compensation for damages; if their actions constitute a violation of public security management, they will be subject to public security management penalties in accordance with the law; and if their actions constitute a crime, they will be held criminally liable in accordance with the law.

Pursuant to the Network Data Safety Management Regulations issued by the State Council on September 24, 2024, and effective January 1, 2025, network data processors shall, in accordance with the provisions of laws, administrative regulations and the mandatory requirements of national standards and on the basis of hierarchical protection of network safety, strengthen network data security protection, establish and improve network data security management systems, and implement technical measures such as encryption, backup, access control, security authentication, and other necessary measures to protect network data from tampering, destruction, disclosure, or illegal acquisition and utilize. They shall also handle network data security incidents, prevent illegal and criminal activities targeting and utilizing network data, and assume primary responsibility for the security of the network data they process. Pursuant to the regulations, network data processors shall establish and improve emergency response plans for network data security incidents. When a network data security incident occurs, they shall immediately activate the plan, take measures to prevent the escalation of the harm, eliminate security risks, and report to the relevant competent authorities in accordance with regulations. Violations of the relevant provisions of these regulations may result in administrative responsibilities such as orders to make corrections, warnings, confiscation of illegal gains, fines, suspension of related businesses, suspension of operations for rectification, revocation of relevant business licenses, or revocation of business licenses imposed by the competent departments of cyberspace administration, telecommunications and public security, among others, in accordance with their respective responsibilities; violations may also be held legally liable by relevant competent departments in accordance with the relevant provisions of laws such as the Cybersecurity Law of the People's Republic of China, the Data Security Law of the People's Republic of China, and the Personal Information Protection Law of the People's Republic of China. If damages are caused to others, civil liability shall be borne in accordance with the law. If acts constitute violations of public security management, public security management penalties shall be imposed in accordance with the law. If crimes are committed, criminal liability shall be pursued in accordance with the law.

Key regulations related to cybersecurity review

Pursuant to the National Security Law of the People's Republic of China (2015 version) promulgated by the SCNPC on July 1, 2015 and effective on the same day, the State would establish a network and information security assurance system, enhance network and information security protection capabilities, strengthen innovative research, development and application of network and information technology, and ensure the security and controllability of core network and information technologies, critical infrastructure, and information systems and data in key areas. Pursuant to this legislation, the state establishes a system and mechanism for national security review and supervision, conducting national security reviews of foreign investment, specific items and key technologies, network information technology products and services, construction projects involving national security issues, and other major events and activities that affect or may affect national security, effectively prevent and mitigate national security risks.

Pursuant to the "Cybersecurity Review Measures" jointly issued by the Cyberspace Administration of China, the National Development and Reform Commission, the Ministry of Industry and Information Technology, the Ministry of Public Security, the Ministry of State Security, MOF, MOFCOM, the State Administration for Market Regulation, the National Radio and Television Administration, the China Securities Regulatory Commission, the State Administration of State Secrets, and the National Cryptography Administration on December 28, 2021 and effective on February 15, 2022, the following circumstances would trigger a cybersecurity review: (i) Where critical information infrastructure operators purchase network products and services, or network platform operators carry out data processing activities that affect or may affect national security, they shall be subject to cybersecurity review in accordance with these measures; (ii) Internet platform operators that hold personal information of more than one million users and wish to be listed overseas must apply to the Cyberspace Administration of China for cybersecurity review; (iii) Network products and services and data processing activities that the member units of the cybersecurity review working mechanism believe affect or may affect national security shall be reviewed in accordance with the provisions of these Measures after being reported by the Cybersecurity Review Office to the Central Cyberspace Affairs Commission for approval in accordance with the procedures.

Principal regulations in relation to the export of data and personal information

Pursuant to the Security Assessment Measures for Data Outbound Transfer issued by the Cyberspace Administration of China on July 7, 2022 and effective September 1, 2022, if a data processor provides data overseas in any of the following circumstances, it shall submit a data outbound transfer security assessment application to the Cyberspace Administration of China through the provincial-level cyberspace administration authorities: (i) the data processor provides important data overseas; (ii) the operator of critical information infrastructure and the data processor that processes the personal information of more than one million persons provide personal information overseas; (iii) the data processor that has provided the personal information of 100,000 persons or the sensitive personal information of 10,000 persons abroad since January 1 of the previous year provides personal information abroad; (iv) other circumstances specified by the Cyberspace Administration of China that require submission of data outbound transfer security assessment application.

Pursuant to the Measures for Standard Contracts for the Overseas Export of Personal Information issued by the Cyberspace Administration of China on February 22, 2023, and effective June 1, 2023, personal information processors providing personal information abroad through standard contracts shall meet the following conditions: (i) not being a critical information infrastructure operator; (ii) processing personal information of less than one million individuals; (iii) providing personal information of less than 100,000 individuals overseas since January 1 of the previous year; or (iv) providing sensitive personal information of less than 10,000 individuals overseas since January 1 of the previous year. Where laws, administrative regulations, or the Cyberspace Administration of China provide otherwise, such provisions shall prevail. Personal information processors may not utilize methods such as quantity splitting to provide personal information that is required by law to undergo export security assessments abroad through standard contracts.

Pursuant to the Provisions on Promoting and Regulating Cross-border Data Flow issued by the Cyberspace Administration of China on March 22, 2024 and effective from the same date, adjustments have been made to relevant provisions such as the Security Assessment Measures for Data Outbound Transfer and the Measures for Standard Contracts for Personal Information Export. Principal adjustments are as follows: (i) New circumstances exempting entities from declaring security assessments for data export, entering into standard contracts for personal information export, or obtaining personal information protection certification; (ii) Clarification that data processors need not declare data outbound security assessments for important data unless such data has been notified or publicly designated as important data by relevant departments or regions; (iii) The triggering conditions for declaring data export security assessments have been adjusted to apply when any of the following conditions are met: (i) operators of critical information infrastructure provide personal information or important data overseas; or (ii) data processors other than operators of critical information infrastructure provide important data overseas, or cumulatively provide personal information (excluding sensitive personal information) of more than one million individuals or sensitive personal information of more than ten thousand individuals overseas since January 1 of the current year;

(iii) The trigger conditions for concluding standard contracts for personal data cross-border transfers or obtaining personal data protection certification shall be adjusted to apply when any data processor other than a critical information infrastructure operator cumulatively transfers overseas, from January 1 of the relevant year, personal information (excluding sensitive personal information) concerning a hundred thousand or more individuals but fewer than one million individuals, or sensitive personal information concerning fewer than ten thousand individuals.

Principal regulations in relation to algorithm recommendation services, deep synthesis services and generative AI services

Pursuant to the "Regulations on Security Assessment of Internet Information Services with Public Opinion Attributes or Social Mobilization Capabilities" jointly issued by the Cyberspace Administration of China and the Ministry of Public Security on November 15, 2018 and effective from November 30, 2018, internet information services with public opinion attributes or social mobilization capabilities include the following scenarios: (i) Operating forums, blogs, microblogs, chat rooms, communication groups, public accounts, short videos, live streaming, information sharing, mini-programs or similar information services, or incorporating such functionalities; (ii) Operating other internet information services that provide channels for public opinion expression or possess the capability to mobilize the public to engage in specific activities.

Pursuant to the Regulations on the Management of Algorithm Recommendation Services for Internet Information Services jointly issued by the Cyberspace Administration of China, the Ministry of Industry and Information Technology, the Ministry of Public Security and the State Administration for Market Regulation on December 31, 2021, and effective from March 1, 2022, providers of algorithm recommendation services with public opinion attributes or social mobilization capabilities shall complete the relevant information filing and fulfil registration procedures through the Internet Information Service Algorithm Filing System within ten working days from the commencement of service provision. Should the filing information of an algorithm recommendation service provider undergo changes, the provider shall complete amendment procedures within ten working days of the change. Should an algorithm recommendation service provider cease operations, it shall complete cancellation of filing procedures within twenty working days of service termination and make appropriate arrangements.

Pursuant to the Regulations on the Management of Deep Synthesis of Internet Information Services jointly issued by the Cyberspace Administration of China, the Ministry of Industry and Information Technology, and the Ministry of Public Security on November 25, 2022 and effective from January 10, 2023, deep synthesis service providers with public opinion attributes or social mobilization capabilities shall perform the filing and change and cancellation procedures in accordance with the Regulations on the Management of Algorithm Recommendation Services for Internet Information Services; deep synthesis service technical supporters shall perform the filing and change and cancellation procedures in accordance with the provisions of the preceding paragraph; deep synthesis service providers and technical supporters who have completed filing shall prominently display their filing number and provide a link to public information on websites, applications, and other platforms where they offer services externally.

Pursuant to the Interim Measures for the Administration of Generative Artificial Intelligence Services jointly issued by the Cyberspace Administration of China, the National Development and Reform Commission, the Ministry of Education, the Ministry of Science and Technology, the Ministry of Industry and Information Technology, the Ministry of Public Security, and the National Radio and Television Administration on July 10, 2023, and effective from August 15, 2023, providers of generative artificial intelligence services with public opinion attributes or social mobilization capabilities shall conduct security assessments in accordance with relevant national regulations and fulfil algorithmic filing, amendment, and cancellation procedures as stipulated in the Regulations on the Management of Algorithm Recommendation Services for Internet Information Services.

Laws and regulations in relation to product quality

Pursuant to the Product Quality Law of the People's Republic of China, as last amended by the Standing Committee of the National People's Congress on December 29, 2018 and effective on the same date, the State Council's market supervision and management department oversees national product quality supervision. Producers are prohibited from manufacturing or selling products that fail to meet standards and requirements safeguarding human health and personal or property safety. Products must not present unreasonable hazards endangering personal or property safety. Where a product defect causes bodily injury or damage to another's property, the victim may seek compensation from the manufacturer or seller. Producers and sellers of non-compliant products may be ordered to cease production or sales, with products subject to confiscation and/or fines; where illegal gains exist, such gains shall be confiscated; in serious cases, business licences may be revoked.

Pursuant to the Civil Code of the People's Republic of China promulgated by the National People's Congress on May 28, 2020 and effective from January 1, 2021, where damage is caused to another person due to a defect in a product, the producer shall bear tort liability. Where damage is caused to another person due to a defect in a product, the injured party may seek compensation from either the producer or the seller of the product. Where the defect in the product is attributable to the producer, the seller, having compensated the injured party, shall have the right to seek recourse against the producer. Where the defect in the product is attributable to the seller's fault, the producer, having compensated the injured party, shall have the right to seek recourse against the seller. Where a defect in the product endangers the personal or property safety of others, the injured party shall have the right to request the producer or seller to bear tort liability, including ceasing the infringement, removing the obstruction, or eliminating the danger.

Laws and regulations regarding imports and exports

Pursuant to the Customs Law of the People's Republic of China, as amended by the SCNPC on April 29, 2021 and effective on the same date, the customs authority is the state organ responsible for supervising and administering the entry and exit of goods across the national border. It has the power to: supervise the entry and exit of means of transport, goods, luggage, postal items and other items in accordance with relevant laws and administrative regulations; levy customs duties and other taxes and fees; investigate and suppress smuggling; compile customs statistics; and handle other customs-related matters. A customs declaration unit refers to import/export consignees and consignors, or customs declaration enterprises, registered with the customs authorities. Import/export consignees and consignors may handle customs declaration procedures themselves or entrust an agent customs declaration enterprise to do so.

Laws and regulations in relation to intellectual property rights

Patent

Pursuant to the Patent Law of the People's Republic of China, as last amended by the SCNPC on October 17, 2020 and effective from June 1, 2021, the patent administration department of the State Council is responsible for managing national patent affairs, uniformly accepting and examining patent applications, and granting patent rights in accordance with the law. Departments responsible for patent administration within the people's governments of provinces, autonomous regions, and municipalities directly under the central government shall manage patent affairs within their respective administrative regions. Inventions and utility models granted patent rights must possess novelty, inventiveness and utility. Patents are classified into three categories: invention patents, utility model patents, and design patents. The term of an invention patent is twenty years, that of a utility model patent is ten years, and that of a design patent is fifteen years, all calculated from the date of application. Once an invention, utility model, or design patent is granted, no entity or individual may implement the patent without the patent holder's permission, except as otherwise provided for in the Patent Law of the People's Republic of China.

Trademark

Pursuant to the Trademark Law of the People's Republic of China, as last amended by the SCNPC on April 23, 2019 and effective from November 1, 2019, and the Implementing Regulations of the Trademark Law of the People's Republic of China, as last amended by the State Council on April 29, 2014 and effective from May 1, 2014, a trademark approved for registration by the Trademark Office of China National Intellectual Property Administration shall be deemed a registered trademark, encompassing goods trademarks, service trademarks, collective trademarks, and certification trademarks. The validity period of a registered trademark shall be ten years, calculated from the date of approval for registration. Where the registered trademark holder wishes to continue using the trademark after the expiry of its validity period, they shall complete the renewal procedures in accordance with the regulations within twelve months prior to the expiry date. The trademark registrant may authorize others to use their registered trademark by entering into a trademark license agreement. The use of a mark similar to a registered trademark on the same goods, or the use of a mark identical or similar to a registered trademark on similar goods, without the trademark registrant's authorization, shall constitute infringement of the exclusive right to the registered trademark where such use is likely to cause confusion. Where an infringement of the exclusive right to a registered trademark occurs, the infringer shall cease the infringement and the infringing goods, together with the tools primarily used for manufacturing the infringing goods or counterfeiting the registered trademark markings, shall be confiscated and destroyed.

Copyright

Pursuant to the Copyright Law of the People's Republic of China, as last amended by the SCNPC on November 11, 2020 and effective from June 1, 2021, intellectual creations in the fields of literature, art, and science that are original and capable of being expressed in a tangible form, whether published or unpublished, shall enjoy copyright protection under the Copyright Law of the People's Republic of China. Copyright encompasses a series of moral and economic rights, including the right of publication, the right to authorship, the right to modify, the right to protect the integrity of the work, and the right of reproduction.

Pursuant to the Measures for the Registration of Computer Software Copyright promulgated by the National Copyright Administration on February 20, 2002 and effective on the same date, and the Regulations on the Protection of Computer Software amended by the State Council on January 30, 2013 and effective on March 1, 2013, the National Copyright Administration oversees the national registration management of software copyright and designates the China Copyright Protection Centre as the registration authority for software. The China Copyright Protection Centre will issue corresponding registration certificates to applicants for computer software copyright registration who meet the requirements stipulated in the "Measures for the Registration of Computer Software Copyright" and the "Regulations on the Protection of Computer Software".

Trade secrets

Pursuant to the Anti-Unfair Competition Law of the People's Republic of China (the "**Anti-Unfair Competition Law**"), as last amended by the SCNPC on June 27, 2025 and implemented on October 15, 2025, trade secrets shall refer to commercial information such as technical information and operational information that is not publicly known, possesses commercial value, and has been subject to appropriate confidentiality measures by the rights holder. Operators shall not engage in the following acts infringing trade secrets: (1) obtaining the right holder's trade secrets through theft, bribery, fraud, coercion, electronic intrusion or other improper means; (2) disclosing, using or permitting others to use the right holder's trade secrets obtained by the means described in the preceding item; (3) disclosing, using, or permitting others to use trade secrets in their possession in breach of confidentiality obligations or the right holder's requirements for safeguarding such secrets; (4) soliciting, enticing, or assisting others to breach confidentiality obligations or the right holder's requirements for safeguarding trade secrets, thereby obtaining, disclosing, using, or permitting others to use the right holder's trade secrets. Where natural persons, legal persons, or unincorporated organizations other than business operators commit the unlawful acts listed in the preceding paragraph, such acts shall be deemed an infringement of trade secrets. Where a third party knowingly or should have known that an employee, former employee, or other entity or individual of the trade secret holder has committed the unlawful acts described in the preceding paragraph of this Article, and nevertheless obtains, discloses, uses, or permits others to use such trade secret, it shall be deemed an infringement of trade secrets. Where an operator, or other natural persons, legal persons, or unincorporated organizations, infringe trade secrets in violation of these provisions, the supervisory and inspection department shall order the cessation of the unlawful acts, confiscate any illegal gains, and impose a fine.

Laws and regulations regarding anti-unfair competition

Pursuant to the Anti-Unfair Competition Law as amended by the SCNPC on June 27, 2025 and implemented on October 15, 2025, operators shall adhere to the principles of voluntariness, equality, fairness, and good faith in market transactions, while complying with laws and commercial ethics and participating in market competition fairly. Unfair competition practices, as defined by the Anti-Unfair Competition Law, shall refer to acts by operators in production and business activities that violate the provisions of the Anti-Unfair Competition Law, disrupt market competition order, and harm the lawful rights and interests of other operators or consumers. Operators who violate the provisions of the Anti-Unfair Competition Law of the People's Republic of China shall bear civil, administrative, and criminal liability according to the specific circumstances.

Pursuant to the Anti-Monopoly Law of the People's Republic of China (the "**Anti-Monopoly Law**"), as last amended on June 24, 2022 and effective from August 1, 2022, the Anti-Monopoly Law shall apply to monopolistic conduct occurring within China, as well as monopolistic conduct occurring outside China that has the effect of excluding or restricting competition within the domestic market. Monopolistic conduct as defined by the Anti-Monopoly Law includes operators entering into monopolistic agreements, operators abusing their dominant market position, and business combinations that have or may have the effect of excluding or restricting market competition. Operators violating the Anti-Monopoly Law may be subject to fines, confiscation of illegal gains, and orders to cease unlawful conduct by the anti-monopoly enforcement authorities.

Laws and regulations in relation to labor, social insurance, and housing provident funds

Labor Law and labor contracts

Pursuant to the Labour Law of the People's Republic of China, as last amended by the SCNPC on December 29, 2018 and effective on the same date; the Labour Contract Law of the People's Republic of China, as last amended by the SCNPC on December 28, 2012 and effective on July 1, 2013; and the Regulations for the Implementation of the Labour Contract Law of the People's Republic of China, promulgated by the State Council on September 18, 2008 and effective on the same date, employers and employees shall establish a written labour contract when forming an employment relationship. A legally concluded labour contract shall be binding, and both employers and employees shall perform the obligations stipulated therein. Employers shall establish and improve labour regulations in accordance with the law to ensure employees enjoy their labour rights and fulfil their labour obligations. Employers shall strictly enforce labour quota standards and shall not compel or indirectly compel employees to work overtime. Where employers arrange overtime work, they shall pay employees overtime compensation in accordance with relevant national regulations. Furthermore, employees' wages shall not be lower than the local minimum wage standard and must be paid to employees promptly.

Social Insurance

Pursuant to the Social Insurance Law of the People's Republic of China, as amended by the SCNPC on December 29, 2018 and effective on the same date, and other relevant laws and regulations, employers within China shall provide their employees with social insurance coverage encompassing basic pension insurance, basic medical insurance, work-related injury insurance, maternity insurance, unemployment insurance, and work-related injury insurance. Employers failing to contribute to the aforementioned social insurance schemes as required may be ordered to make payments or make up arrears within a specified timeframe. Failure to comply by the deadline may result in the imposition of fines.

Housing Provident Fund

Pursuant to the Housing Provident Fund Administration Regulations, as last amended by the State Council on March 24, 2019 and effective on the same date, the housing provident fund shall refer to the long-term housing savings contributed by employers and their employed staff. Employers within China shall contribute to the housing provident fund for their employees as stipulated. Employers who fail to pay or underpay housing provident fund contributions may be ordered by the Housing Provident Fund Management Center to make payments within a specified timeframe. Failure to comply may result in an application to the People's Court for enforcement.

Laws and regulations regarding foreign exchange and overseas investment

Foreign Exchange

Pursuant to the Regulations on Foreign Exchange Administration of the People's Republic of China, last amended by the State Council on August 5, 2008 and implemented on the same date, foreign exchange under the current account (referring to transactions involving goods, services, income, and current transfers in the balance of payments) may be converted into other currencies. For capital account (covering capital transfers, direct investment, securities investment, derivatives, and loans), overseas institutions and individuals undertaking direct investment within China must register with the foreign exchange administration authorities upon obtaining approval from the relevant competent authorities. Domestic institutions and individuals engaging in direct overseas investment or participating in the issuance or trading of overseas securities or derivatives must register in accordance with the regulations of the State Council's foreign exchange administration department.

Pursuant to the "Notice of the State Administration of Foreign Exchange on Issues Concerning Foreign Exchange Management for Overseas Listings" issued and implemented on December 26, 2014, domestic companies shall register their overseas listing with the foreign exchange bureau at their place of registration within 15 working days of the completion of the overseas listing issuance, presenting relevant documentation. Funds raised by domestic companies through overseas listings may be repatriated to the domestic market or retained overseas. The use of such funds must be consistent with the purposes stated in publicly disclosed documents, including the document, bond offering circular, shareholder circular, and resolutions of the board of directors or shareholders' general meeting.

Pursuant to the Notice of the People's Bank of China on Further Improving Cross-Border Renminbi Business Policies to Facilitate Trade and Investment, issued by the People's Bank of China and implemented on January 5, 2018, funds raised by domestic enterprises through offshore Renminbi bond issuances may be repatriated for domestic use as required. Funds raised by domestic enterprises through offshore Renminbi share issuances may be repatriated for domestic use as required.

Pursuant to the "Notice of the State Administration of Foreign Exchange on Further Deepening Reforms to Facilitate Cross-Border Trade and Investment" issued by the State Administration of Foreign Exchange and implemented on December 4, 2023, the utilization of foreign exchange income under capital contributions and external debt, along with the Renminbi proceeds from its conversion, by non-financial enterprises shall adhere to the principles of authenticity and self-use. Such funds shall not be directly or indirectly employed for expenditures prohibited by national laws and regulations; Unless otherwise explicitly stipulated, such funds shall not be directly or indirectly used for securities investment or other investment management activities (excluding wealth management products with a risk rating no higher than Level 2 and structured deposits); they shall not be used to extend loans to non-affiliated enterprises (except where explicitly permitted by the business scope and in the following four designated areas: Lin'gang New Area of the China (Shanghai) Pilot Free Trade Zone, Nansha New Area of the China (Guangdong) Pilot Free Trade Zone, Yangpu Economic Development Zone of the China (Hainan) Free Trade Port, and Beilun District of Ningbo City, Zhejiang Province). They shall not be used to purchase residential properties for non-self-use purposes (except for enterprises engaged in real estate development or real estate leasing operations).

According to the "Notice on Issues Concerning the Management of Funds Raised from Overseas Listings by Domestic Enterprises" (Yin Fa [2025] No. 252), issued by the People's Bank of China and the State Administration of Foreign Exchange on December 24, 2025, and effective as of April 1, 2026, funds raised from overseas listings by domestic enterprises should, in principle, be repatriated to China in a timely manner. If such funds are to be retained overseas for purposes including overseas direct investment, overseas securities investment, or overseas lending, the relevant competent authority's approval or filing documents must be obtained prior to the completion of the overseas listing and issuance or the closing of the over-allotment option, and the relevant cross-border fund management regulations must be complied with.

Overseas Investment

Pursuant to the Administrative Measures for Overseas Investment promulgated by MOFCOM on September 6, 2014 and implemented on October 6, 2014, the MOFCOM and provincial-level competent authorities for commercial matters shall implement either filing or approval management based on the specific circumstances of an enterprise's overseas investment. Overseas investments involving sensitive countries/regions or sensitive industries shall be subject to approval management; all other overseas investments shall be subject to filing management.

Pursuant to the Administrative Measures for Enterprise Overseas Investment promulgated by the National Development and Reform Commission on December 26, 2017 and implemented on March 1, 2018, domestic enterprises undertaking overseas investment shall complete procedures such as project approval and filing, report relevant information, and cooperate with supervision and inspection. The scope of approval management encompasses sensitive projects undertaken either directly by the investing entity or through its controlled overseas enterprises, specifically including projects involving sensitive countries/regions or sensitive industries. The scope of filing management covers non-sensitive projects undertaken directly by the investing entity, namely non-sensitive projects involving the direct investment of assets, equity interests, or the provision of financing or guarantees by the investing entity.

Laws and regulations in relation to foreign investment supervision

Pursuant to the Foreign Investment Law of the People's Republic of China promulgated by the National People's Congress on March 15, 2019 and effective from January 1, 2020, and the Implementing Regulations of the Foreign Investment Law of the People's Republic of China promulgated by the State Council on December 26, 2019 and effective from January 1, 2020, The State implements a pre-establishment national treatment plus negative list management system for foreign investment. Foreign investors shall not invest in sectors prohibited under the Foreign Investment Access Negative List. For sectors subject to restrictions under the Foreign Investment Access Negative List, foreign investors must comply with the conditions specified therein. Sectors not included in the negative list shall be managed according to the principle of equal treatment for domestic and foreign investment. Concurrently, the State shall formulate a Catalogue of Industries Encouraging Foreign Investment based on national economic and social development needs, specifying particular industries, sectors, and regions where foreign investors are encouraged and guided to invest.

Current sectoral access provisions for foreign investors conducting investment activities within China are contained in two catalogues: the Special Administrative Measures for Market Access of Foreign Investment (Negative List) (2024 Edition) jointly promulgated by the National Development and Reform Commission and MOFCOM on September 6, 2024 and effective as of November 1, 2024, and the Catalogue of Industries Encouraging Foreign Investment (2025 Edition), jointly promulgated by the National Development and Reform Commission and MOFCOM on December 15, 2025 and effective from February 1, 2026. Foreign investment activities under these catalogues are categorized into three types: encouraged, restricted, and prohibited. Industries not included in these three categories are permitted for foreign investment, unless subject to specific restrictions under other laws and regulations within China. As advised by our PRC Legal Advisor, our Group's core business lines — Intelligent Urban Rail Transit Solutions, Intelligent Urban Transportation Management Solutions, and Enterprise Digital Transformation Solutions — all fall within sectors where foreign investment is permitted.

Laws and regulations in relation to taxation matters

Enterprise Income Tax

Pursuant to the Enterprise Income Tax Law of the People's Republic of China, last amended by the SCNPC on December 29, 2018 and implemented on the same date, and the Implementing Regulations of the Enterprise Income Tax Law of the People's Republic of China, last amended by the State Council on December 6, 2024 and implemented on January 20, 2025, a resident enterprise shall refer to an enterprise established in accordance with the law within the territory of China, or an enterprise established under the laws of a foreign country (region) but with its actual management located within the territory of China. Resident enterprises shall pay enterprise income tax at a rate of 25% on income derived both within and outside the territory of China. The State provides enterprise income tax incentives for industries and projects receiving key support and encouragement for development.

Pursuant to the Enterprise Income Tax Law of the People's Republic of China, the Implementing Regulations of the Enterprise Income Tax Law of the People's Republic of China, the Measures for the Administration of High-Tech Enterprise Recognition jointly issued by the Ministry of Science and Technology, MOF, and the State Taxation Administration, the Announcement of the State Taxation Administration on Issues Concerning the Implementation of Preferential Enterprise Income Tax Policies for High-Tech Enterprises issued by the State Taxation Administration, and other relevant enterprise income tax laws and regulations, eligible high-tech enterprises may enjoy a preferential enterprise income tax rate of 15%.

VAT

According to the Value Added Tax Law of the People's Republic of China promulgated by the Standing Committee of the National People's Congress on December 25, 2024 and effective on January 1, 2026, taxpayers who sell goods, provide processing, repair and replacement services, lease services of tangible movables, or import goods within the territory of China, shall be subject to a value-added tax (VAT) rate of 13%, unless otherwise provided; taxpayers who sell transportation, postal services, basic telecommunications, construction, or lease services of real property, sell real property, transfer the right to use land, or sell or import goods subject to the 9% VAT rate shall be subject to a value-added tax (VAT) rate of 9%, unless otherwise provided; taxpayers who sell services or intangible assets, shall be subject to a value-added tax (VAT) rate of 6%, unless otherwise provided; taxpayers who export goods, shall be subject to a zero VAT rate, unless otherwise provided by the State Council; domestic entities and individuals who sell services or intangible assets within the scope specified by the State Council across borders shall be subject to a zero VAT rate.

Laws and regulations in relation to overseas securities issuance and listing of domestic enterprises

The Securities Law of the People's Republic of China, as last amended by the SCNPC on December 28, 2019 and effective from March 1, 2020, provides comprehensive regulation of activities within China's domestic securities market. This encompasses securities issuance and trading, acquisitions of listed companies, stock exchanges, and securities firms, as well as the duties of securities regulatory authorities. The Securities Law of the People's Republic of China further stipulates that domestic enterprises issuing securities directly or indirectly overseas, or listing securities abroad, must comply with relevant State Council regulations. Specific measures for subscribing to and trading shares of domestic companies in foreign currencies shall be separately prescribed by the State Council. The China Securities Regulatory Commission (the "**CSRC**"), established by the State Council, serves as the securities regulatory authority responsible for overseeing the securities market in accordance with the law, maintaining market order, and ensuring lawful market operations. Currently, the issuance and trading of H-shares primarily adhere to regulations and rules promulgated by the State Council and the CSRC.

Pursuant to 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》) issued by the CSRC on February 17, 2023 and effective from March 31, 2023, domestic enterprises undertaking an initial public offering or listing overseas shall file with the CSRC within three working days after submitting their application documents overseas.

Pursuant to the Regulations on Strengthening Confidentiality and Archival Management for Domestic Enterprises Issuing Securities and Listing Overseas jointly revised by CSRC, MOF, the State Administration for State Secrets Protection, and the National Archives Administration on February 24, 2023 and effective from March 31, 2023, Domestic enterprises engaged in overseas issuance and listing activities, as well as securities companies and securities service institutions providing relevant services to them, shall strictly comply with relevant laws and regulations of China, as well as the requirements of these regulations. They shall enhance their legal awareness regarding the protection of state secrets and the strengthening of archives management, establish and improve confidentiality and archives management systems, take necessary measures to implement confidentiality and archives management responsibilities, and shall not leak secrets of the State or work secrets of State organizations, nor harm the interests of the State or those of the public. Where domestic enterprises provide or publicly disclose documents or materials involving State secrets or work secrets of State organizations to relevant securities companies, securities service institutions, overseas regulatory bodies, or other entities and individuals, or provide or publicly disclose such materials through their overseas listed entities, they shall obtain approval from the competent authority with approval authority and file a record with the confidentiality administrative department at the same level.