

## BUSINESS

### OVERVIEW

XTransfer is the world’s largest B2B cross-border trade payment platform with over US\$60 billion TPV in 2025, according to CIC. Founded in 2017 as one of the first payment platforms worldwide dedicated to B2B cross-border trade, we serve the largest customer base of approximately 897,000 registered SMEs globally as of March 31, 2026, according to CIC. Throughout economic cycles and across geographies, our strategic focus and purpose have remained consistent: making SME payment services simple and accessible.

The B2B cross-border trade payment industry is characterized by complex trade transactions typically conducted offline with larger ticket sizes, high and complicated compliance requirements across different countries and regions, foreign exchange shortage (especially in emerging markets), fragmented data flows and low level of digital penetration. These factors increase the complexity and costs of AML and risk management, making serving SMEs less attractive to traditional banks. Despite forming the backbone of the global economy, SMEs remain significantly underserved by traditional banking systems, which are generally designed for large corporations. Accordingly, SMEs face challenges of low service accessibility, frequent bank account freezes or closures, foreign exchange shortage, long settlement cycles, and high fees. As a result, SMEs often struggle to obtain reliable payment services, with many forced to turn to unlicensed money service operators.

We established XTransfer to address the aforesaid significant pain points faced by SMEs. To tackle these challenges, we built X-Net, which is the world’s first and only globally unified B2B cross-border settlement network and risk management platform, according to CIC. Through X-Net, we centralize risk management and route payments across banks end-to-end, enabling SMEs to transact easily, directly and swiftly with one another. As of March 31, 2026, we provide payment services across more than 200 countries and regions through partnership with financial institutions, including some of the most established international banks around the world. We further integrate X-Net with a digital wallet, allowing SMEs to interact with the network intuitively via a single APP, collecting, converting and transferring money across the borders at fingertips. The combined settlement network + digital wallet approach resembles what card schemes and digital wallet providers have built in the C2B payment industry.

As a technology-driven company, we further enhance our platform with TradePilot — the world’s first and most advanced vertical AI model for B2B cross-border trade payment according to CIC. TradePilot enhances our service quality by enabling the highest rate of automated transaction reviews of approximately 98.5%, one of the lowest fraud rates of approximately 0.003%, and one of the most cost-effective risk management practices in our industry, as of March 31, 2026, according to CIC.

The following diagram shows the highlights of our business:

Leading Industry Position	Superior Technology Capability	Compelling Financial Performance
<p><b>No. 1</b></p> <p>B2B cross-border trade payment platform globally with TPV over US\$60 billion in 2025</p>	<p><b>TradePilot</b></p> <p>World’s first and most advanced vertical AI model for B2B cross-border trade payment</p>	<p><b>47.1%</b></p> <p>2023-2025 Revenue CAGR, reaching US\$248.5 million in 2025</p>
<p><b>Largest</b></p> <p>Customer base with approximately 897,000 global registered SME customers<sup>(1)</sup></p>	<p><b>Top Tier Fraud Detection</b></p> <p>With a fraud rate as low as <b>0.003%</b><sup>(1)</sup></p>	<p><b>&gt;90%</b></p> <p>2023-2025 Gross Margin</p>
<p><b>X-Net</b></p> <p>Only-of-its-kind globally unified B2B cross-border settlement network and risk management platform</p>	<p><b>98.5%</b>      <b>~US\$5</b></p> <p>Highest rate of automated transaction reviews<sup>(1)</sup>      Average monthly risk management cost per active customer<sup>(2)</sup></p>	<p><b>161.4%</b></p> <p>2023-2025 Operating Profit CAGR, reaching US\$44.1 million in 2025</p>

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### Notes:

- (1) As of March 31, 2026.
- (2) In 2025.

### Market Opportunities

The B2B cross-border trade payment market is enormous and fast-growing. According to CIC, the global B2B cross-border trade payment volumes for manufactured goods reached US\$33.2 trillion in 2025 and is projected to further expand to US\$39.5 trillion by 2030, with significant potential for digital penetration. In 2025, market size of global B2B cross-border trade payment platforms, as measured by TPV for manufactured goods trade, reached US\$1,187.6 billion, achieving 3.6% penetration rate based on the global B2B cross-border trade payment volumes for manufactured goods. This TPV is projected to grow to US\$3,986.0 billion by 2030, achieving a CAGR of 27.4% from 2025 to 2030, with the penetration rate increasing to 10.1%, significantly outpacing the approximately 2% CAGR projected for traditional banks.

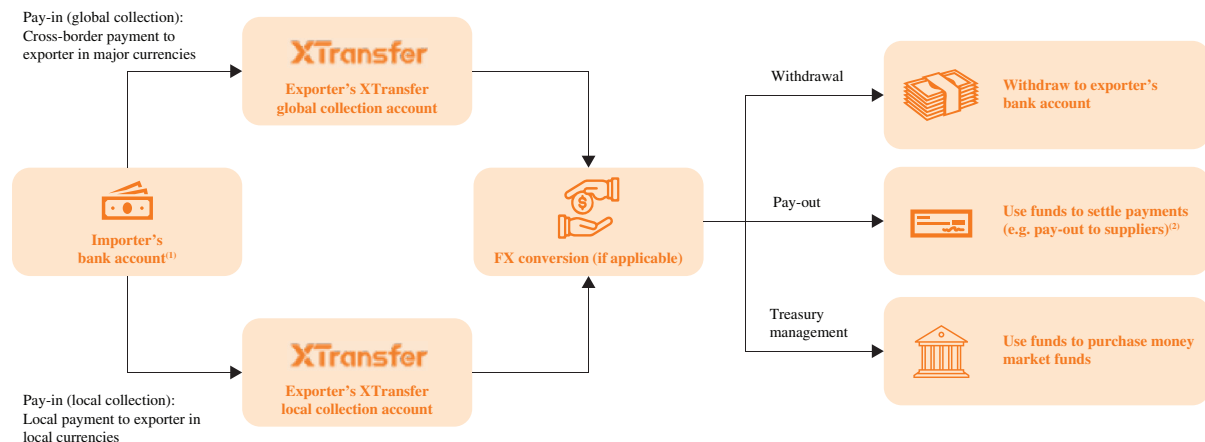
Building comprehensive service offerings and ecosystems to address customers’ diverse needs has become an industry trend for payment platforms. As a result, B2B cross-border trade payment platforms are expanding beyond core payment capabilities into additional value-added services to deliver enhanced functionality and customer value. Furthermore, blockchain technology has the potential to become one of the major drivers of the next generation of efficient, secure and low-cost settlement infrastructure.

### Our Solutions and Benefits to Customers

We provide secure, efficient, and innovative payment services to SMEs:

- *Pay-in services* that allow SMEs to collect funds from their trade counterparties or top-up funds to their collection accounts accessible on our platform in major currencies and/or various local currencies;
- *Foreign exchange services* in connection with trade payment transactions under which we help SMEs convert funds in their collection accounts into designated currencies of their choice in accordance with relevant laws and regulations; and
- *Pay-out and withdrawal services* that allow SMEs to withdraw funds to their bank accounts and/or pay to third parties for merchandise, marketing, logistics and other services expenses.

Our SME customers include both exporters and importers. The following diagram illustrates XTransfer’s business model and client fund flow underlying our offerings for an exporter customer:



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*Notes:*

- (1) Importer can open accounts at XTransfer and top-up funds in such accounts for subsequent payment to exporters.
- (2) Exporter can also top-up funds into its XTransfer account if existing balance is insufficient for subsequent pay-out purposes.

In addition, we offer other value-added services that complement our core payment services to address the diverse needs of SMEs such as treasury management for customers outside Chinese Mainland and software services.

Our service offerings deliver differentiated, measurable value to SMEs relative to traditional bank transfers and other payment platforms:

- **Service accessibility:** We utilize AI and real-world transaction data to ensure seamless yet robust KYC and offer free, rapid onboarding through our platform within 24 hours.
- **Uninterrupted services:** We digitalize identity verification and transaction monitoring, apply AI-powered risk assessment, and automate document reviews. Our robust risk controls mitigate financial institutions’ risk management concerns that often lead to frequent bank account freezes or closures.
- **FX availability:** We integrate global liquidity resources on our platform, particularly across minor currency pairs, enabling us to alleviate foreign exchange shortage, especially in emerging markets, and allowing SMEs to convert from their local currencies to major currencies (and also across minor currency pairs), all within a compliant framework.
- **Fast settlement:** We automate the payment process by integrating and connecting various global and local financial institutions onto X-Net to achieve fast cross-border transfers, shortening payment rails and enabling same-day settlement for most transactions.
- **Low fees:** We transform cross-border payment into localized transactions through local collection accounts, significantly decreasing correspondent bank fees. According to CIC, we realized approximately 95% reduction in transfer fees and 80% reduction in foreign exchange conversion costs compared to traditional bank transfers as of December 31, 2025.

### **Our Go-to-Market Strategy**

B2B cross-border trade payments are often complex and unintuitive, involving multiple processes like foreign exchange management and reporting, AML compliance, customs declarations, and bank account reconciliation. These processes may be difficult for SMEs to navigate and often require product introduction, onboarding assistance and ongoing support to facilitate adoption and usage of payment platform services.

Against this industry backdrop, we have adopted a go-to-market strategy centered on a strong and efficient sales force, supported by omni-channel marketing and customer service capabilities. We believe this approach is suited to the needs of SME customers, who often require personalized communication and full lifecycle support. Our sales and marketing capabilities are supported by the largest sales team among B2B cross-border trade payment platforms as of December 31, 2025, comprising over 2,000 professionals with global service coverage. Our global sales team delivers deep market coverage and personalized outreach across diverse industries. They provide hands-on customer support throughout the entire client lifecycle, from initial engagement to long-term relationship management. We complement our direct sales efforts with an omni-channel marketing strategy, including social media marketing, participation in international and domestic trade fairs, and referrals from existing customers and ecosystem partners, such as trade associations and logistics companies. We believe this integrated go-to-market strategy supports customer acquisition and retention, and its effectiveness is reflected in our industry-leading payback period of 7.6 months in 2025, which defined as the period of time required for the cumulative revenue generated by a new customer to exceed the customer acquisition costs incurred in acquiring such customer.

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### Our Operational and Financial Performance

We deliver resilient performance across economic cycles with robust growth and sustained profitability. During the Track Record Period, TPV on our platform surged from US\$18.6 billion in 2023, to US\$60.5 billion in 2025 at a CAGR of 80.2%, driving revenue growth from US\$114.8 million to US\$248.5 million over the same years at a CAGR of 47.1%. Our gross profit also accelerated from US\$109.7 million to US\$228.6 million at a CAGR of 44.4% from 2023 to 2025, supported by exceptional gross margins consistently above 90% during the Track Record Period. Our operating profit increased from US\$6.5 million in 2023 to US\$44.1 million in 2025, representing a CAGR of 161.4% during the same years and underscoring our ability to achieve profitability. We recorded net loss of US\$152.9 million, US\$353.1 million and US\$483.5 million in 2023, 2024 and 2025, respectively, mainly due to fair value changes of convertible and redeemable preferred shares. Nonetheless, we are a profitable business as evidenced by adjusted net profit (non-IFRS measure) of US\$11.2 million, US\$5.3 million and US\$47.7 million in 2023, 2024 and 2025, respectively. For details on adjustments, implications and limitations of adjusted net loss (non-IFRS measure), see “Financial Information — Non-IFRS Measures.”

Through our relentless efforts and dedication to elevate SME’s experience in cross-border trade payment, we have built a reputation as a trusted, scalable, and secure payment partner and have cemented ourselves as the largest B2B cross-border trade payment platform globally. As we continue to grow, we envision ultimately becoming a global platform for businesses of all sizes with solutions beyond payment services.

### OUR STRENGTHS

#### Undisputed Market Leadership in the Global B2B Cross-border Trade Payment Industry with Significant Growth Potential

We are the world’s largest B2B cross-border trade payment platform, as measured by US\$60.5 billion TPV with a market share of 5.1% in 2025, and serving the world’s largest customer base of approximately 897,000 registered SMEs globally as of March 31, 2026, according to CIC. Operating in a industry characterized by high entry barriers, our distinctive position as a digital payment platform dedicated to B2B cross-border trade payment has driven rapid growth and facilitated the expansion of our global footprint. During the Track Record Period, TPV on our platform grew significantly at a CAGR of 80% from 2023 to 2025, substantially outpacing the industry CAGR of 34% as well as the CAGR of next five largest B2B cross-border trade payment platforms during the same years. This growth led to strong revenue growth from US\$114.8 million to US\$248.5 million over the same period, at a CAGR of 47.1%. Our gross profit also grew significantly at a CAGR of 44.4% from 2023 to 2025, with gross margins consistently exceeding 90% throughout the Track Record Period. We continue to expand our presence in international market, witnessing robust growth of our business in global market with percentage of TPV generated from customers outside Chinese Mainland increasing from 24.5% in 2023 to 44.3% in 2025.

#### Building the World’s First and Only Globally Unified B2B Cross-Border Settlement Network, X-Net

We have transformed traditional B2B cross-border trade payments by pioneering X-Net, a globally unified B2B cross-border settlement network and risk management platform. Before X-Net, no such platform existed for B2B cross-border trade. X-Net centralizes risk management and routes payments across banks end-to-end.

X-Net enables SMEs to transact directly with trade counterparties via a single platform without the burden of dealing with multiple financial institutions, which removes multiple intermediaries and extra fees along traditional correspondent banking network. We support end-to-end settlement of payment transactions in local currency by directly connecting sender and recipient banks through X-Net — our proprietary unified settlement network — in 56 countries and regions as of March 31, 2026. Furthermore, through partnership with international banks, we also leverage existing settlement networks to provide payment services across more than 200 countries and regions, enabling SMEs to settle cross-border trade transactions in major currencies. X-Net integrated 171 financial institutions globally as of March 31, 2026, via standardized APIs, enabling fully automated, 24/7 fund flows, data exchanges, and operational processes across our partner network. Benefiting from X-Net’s rapidly expanding global network, we are well-positioned to secure highly competitive FX rates and integrate deep global liquidity resources, particularly across more minor currency pairs. This unified platform also enhances our risk control capabilities by consolidating previously fragmented cross-border transaction data into a single, structured

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database. Through X-Net, we consistently expand our local collection capabilities, with the proportion of payment transaction counts processed through local collection experiencing significant growth, increasing from 16.0% in 2023 to over 50.0% in 2025.

### **Technology Innovation with the World’s First and Most Advanced Vertical AI Model, TradePilot**

We are a leader in applying advanced technologies to B2B cross-border trade payment. At the heart of our technological capabilities lies TradePilot, the world’s first and most advanced vertical AI model in B2B cross-border trade payment, according to CIC. TradePilot is trained on our massive, high-quality transaction data systematically curated over years of operations. It is further verified by our proprietary knowledge map dedicated to the global trade industry, which inject precise domain context and reveal relationships among enterprises, goods, and industry networks to our model. As of December 31, 2025, we processed over nine million B2B cross-border pay-in transactions and over 10 million offline, unstructured foreign trade documents. As of the same date, our knowledge map included approximately 19 million mapped relationships, encompassing information on upstream-downstream value chains, hundreds of thousands of products, and know-how with respect to approximately 100 industries across most countries and regions worldwide, according to CIC. Benefiting from the aforesaid high quality data and proprietary knowledge map, TradePilot consistently outperforms some leading general-purpose VLLMs. In 2025, according to CIC, TradePilot demonstrates a clear edge over Gemini-2.5-Pro and GPT-5 in the accuracy and speed of recognizing and processing unstructured foreign trade data, including ID and foreign trade documents.

As our AI models process more transaction data, they continuously self-iterate and improve, strengthening our risk management capabilities and enhancing the customer transaction experience. This attracts more customers and drives higher transaction activity on our platform, creating additional data that further accelerates model refinement. With TradePilot embedded across our operations, more than 98.5% of transactions are automatically reviewed as of March 31, 2026, substantially outperforming the below-50% seen in traditional banks, according to CIC, underscoring our advanced risk capabilities. The automatic customer service resolution rate improved from approximately 13% in 2023 to over 88% in 2025, and the risk management cost per transaction decreased by approximately 50% during the Track Record Period. These improvements enhance customer experience and ultimately drive strong TPV, revenue, and profitability growth.

### **Fully Compliant Operations and Best-in-Class Risk Management**

Our compliance-first philosophy and rigorous risk management form the bedrock of our business success and competitive leadership. We operate globally in full compliance with local regulatory requirements. As of March 31, 2026, we have obtained required licenses in key jurisdictions, including the Chinese Mainland, Hong Kong, the United Kingdom, the United States, Singapore, Netherlands (allowing us to provide electronic money and payment services across all 30 EEA countries under passporting), Australia and Canada. Our robust risk control system spans the entire client lifecycle, covering pre-transaction KYC procedures, in-transaction reviews and AML/anti-fraud checks, and continuous post-transaction risk monitoring. This capability is evident in our partnership with 171 financial institutions worldwide as of March 31, 2026, increasing from 28 as of December 31, 2023. Our expanding network of partners reflects the confidence that the world’s foremost financial institutions have in our robust risk controls.

We combine deep human expertise with advanced AI technologies in risk management. We have assembled a highly experienced risk management team of over 300 specialists. Our sales team, supported by risk-aligned incentive mechanisms, further complement this team by acting as the first line of defense, proactively identifying risks at the earliest stage to ensure strong mitigation from the outset. We have implemented multiple risk checkpoints throughout the entire transaction lifecycle, ensuring continuous monitoring at each stage. To support these checkpoints, we employ AI-driven models and rule-based systems tailored to different risk categories and typologies. As of March 31, 2026, 51 AI agents were built into our review processes, enabling precise and comprehensive risk assessments across diverse trade scenarios. This approach also leads to one of the most cost-effective risk management practices in our industry, according to CIC.

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As a result, we have achieved market-leading fraud detection, with a fraud rate, defined as the number of fraudulent transactions over the number of total transactions, as low as 0.003% as of March 31, 2026. Our AI-enabled risk control capabilities have earned us prominent industry recognition, making us the only B2B cross-border trade payment company to receive the “Best In-house Use of AI in Fraud and Financial Crime Detection” award at the Regulation Asia Awards for Excellence 2025.

### **Effective Go-to-market Strategy Driving Customer Growth and Loyalty**

We implement a holistic go-to-market strategy that boosts customer acquisition, customer retention and business growth. By leveraging an omni-channel marketing approach, including face-to-face sales, social media marketing, international and domestic trade fairs, and referrals from both existing customers and ecosystem partners such as trade associations and logistics companies, we have built an efficient and comprehensive sales and marketing network worldwide. SMEs have long been under-served and require targeted education on innovative, tech-enabled payment services to drive awareness, build trust, and accelerate adoption. As such, we built an efficient and large global sales force of over 2,000 professionals as of December 31, 2025, and plan to establish new sales centers aligned with our global expansion plan. This enables us to precisely target new customers through tailored outreach, deliver compelling service and product education, and cultivate enduring trust, ultimately driving growth. In 2023, 2024 and 2025, our annual active customers increased from 82,614 to 111,368 and further to 148,952.

We focus on deepening client relationships by incentivizing our sales professionals to deliver personalized services. This approach is enhanced by targeted cross-selling and up-selling initiatives. We offer various products and employ a structured, data-driven approach to increase our wallet share within existing customers through regular customer reviews and integrated service bundles. Our product categories continue to expand based on our deep understanding of evolving client needs, encompassing local collection, FX conversion and treasury management. Our high customer net dollar retention rate of 121% in 2025 is a testament to our strong customer retention and relationship support capabilities.

### **Powerful Network, Creating Flywheel Effects**

Word-of-mouth referrals are a key driver of SME customer growth. Daily interactions among SMEs naturally facilitate new client onboarding, attracting more SME sellers and buyers to our platform and expanding our customer base. In 2025, approximately 50% of new customers were acquired through referrals by existing customers. This has also been instrumental in advancing our global expansion strategy, enabling us to reach international customers through referrals by Chinese exporters. We have seen significant expansion of our international business, with the percentage of TPV generated from customers outside Chinese Mainland increasing from 24.5% in 2023 to 34.8% in 2024 and further to 44.3% in 2025.

Our market leadership, strong customer base, and proprietary customer and transaction data make us a partner of choice for financial institutions. We leverage human expertise and AI technologies to conduct rigorous pre-filtering and due diligence on SME trades and backgrounds, effectively streamlining banks’ compliance workflows by detecting fraudulent or fictitious activity with greater accuracy. Additionally, X-Net offers ready-to-use frameworks for cross-border trade payment and risk management in emerging markets, accelerating digital transformation for banks in these markets. As a result, financial institutions are increasingly eager to partner with us, helping us expand our proprietary settlement network and strengthen our product offerings, which in turn attracts more customers.

As a result of the aforesaid networks, we achieved self-reinforcing flywheels for growth:

- A larger customer base generates richer data, which strengthens risk controls and improves customer experience, attracting even more customers.
- A larger customer base, combined with stronger risk management capabilities, secures broader support from financial institutions, leads to expanded settlement network, and increases the value we delivered, further accelerating customer growth.

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- A larger customer base strengthens brand recognition, which raises sales efficiency and enables a larger and more effective sales force, fueling continued expansion.
- More SME sellers attract more SME buyers, and more SME buyers attract more SME sellers, amplifying customer growth.

### **Visionary and Experienced Management Team Delivering Compelling Performance**

Our leadership and performance is rooted in our management team's deep industry expertise and execution capabilities. Our management team has extensive experience working in leading international payments companies such as Visa, PayPal, and Alipay. On average, they have over 20 years of industry experience in cross-border payments, technology, risk management and regulatory compliance.

Mr. Deng Guobiao, our founder and CEO, is a visionary leader and expert in cross-border payment and financial services. He drives innovation and market expansion through vision and foresight over the landscape and development of cross-border trade payment industry. Prior to founding our company, Mr. Deng held several leadership positions at Ant Group, having previously worked at Visa after postgraduate graduation. Under his leadership, we have become the largest B2B cross-border trade payment platform globally.

Our management demonstrates strong execution capabilities and is able to efficiently deploy capital. As a result, we had only incurred cash expenditure of approximately US\$40 million since inception to reach adjusted net profit (non-IFRS) breakeven, while delivering significant revenue growth and operating profit at scale. Furthermore, our experienced and cohesive senior management team has worked closely together and shared a long-term strategic vision. We believe this continuity and alignment are critical to our execution, organizational development and scalable growth. Our management team's long-standing collaboration provides a strong foundation for our future expansion.

## **OUR STRATEGIES**

### **Continuous International Expansion**

We will continue to invest in global expansion in three key areas: geographical expansion, localization, and brand building.

We will strengthen our presence in key emerging markets with substantial growth potential, including Southeast Asia, Africa, Latin America, and the Middle East. Our market entry will be driven by license applications and partnerships with local financial institutions.

We are committed to deep localization to better serve local customer needs. We will expand our on-the-ground sales and service teams to accelerate customer acquisition and deepen market penetration. Additionally, we will invest and strengthen our operations across sales, risk management, legal, compliance, and human resources, as well as finance and tax, translating our global platform strength into local market relevance and superior customer service.

Concurrently, we aim to strengthen our brand image as a leading global B2B cross-border trade payment platform by delivering tangible value that drives customer acquisition, retention, and loyalty worldwide. Our integrated marketing and branding strategy will prioritize meaningful engagement and highlight our product strengths, regulatory and compliance standards, robust risk control capabilities, and customer-centric values with a view to build global recognition and trust.

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### Expand and Deepen Partnerships with Global Financial Institutions

We plan to continuously expand X-Net by deepening our network of partnerships with financial institutions worldwide. Our strategic objective is to grow our financial institution partner base from 171 as of March 31, 2026 to more than 1,000 within the next ten years. This expansion is crucial to strengthening the coverage and capabilities of our global settlement network. By enabling direct connectivity to global and local settlement networks across major trade corridors, we can improve local FX liquidity resources in emerging markets. This extensive, directly integrated network will enable us to provide clients with more comprehensive payment services, making cross-border payments faster, cheaper, and more convenient.

### Invest in AI Technologies

We will continue to invest in advanced AI technologies and integrate them into our platform. These innovations will enhance risk management, optimize product development and boost operational efficiency.

- **Risk management:** We will continue to deploy advanced AI to strengthen risk management and compliance. Our priorities include expanding data coverage for better and more systematic risk identifications, accelerating the training and deployment of TradePilot to improve risk detection, and refining existing and developing new AI agents embedded in risk workflows to boost the efficiency and accuracy of risk review and support decision-making.
- **Product development:** We will use AI to analyze customer behavior and market trends to identify unmet needs and optimize existing product features. By embedding AI in product development, we aim to accelerate further customer onboarding, enhance payment efficiency, improve treasury management, and deliver superior customer experience. Additionally, we will deploy AI agents to accelerate product iteration through AI-assisted research and development.
- **Operational efficiency:** We will deepen AI integration across our operations to enhance service availability and efficiency, and reduce unit costs. This includes deploying AI in customer service through intelligent self-service solutions and chatbots, delivering 24/7 global support and improving resolution rates. AI will also power payment operations and FX strategy calibration, ensuring enhanced customer experience.

In addition, we recognize that top-tier talent is the fundamental driver of our sustained R&D leadership. We will continue to attract and retain the world’s foremost experts in AI, and cross-border payments. To foster continuous innovation, we will deepen our collaboration with leading academic institutions and think tanks to upgrade and develop innovative solutions.

### Expand Product and Service Offerings

To serve the evolving needs of our clients, we will strategically expand our product and service offerings along the entire value chain of B2B cross-border trade payment. Our expansion will focus on two tracks: deepening our core payment services and expanding new value-added services. To enhance our core payment services, we will broaden local collection coverage and expand local payout channels across key markets. Additionally, we will introduce new capabilities such as digital settlement leveraging emerging technologies to provide clients with greater flexibility in managing their cross-border payments.

Beyond payments, we will further address our clients’ financial and operational needs by offering a comprehensive suite of value-added services in compliance with applicable laws, regulations and policies. These offerings include treasury management products such as money market funds and other suitable investment options, as well as corporate management tools.

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### Open Settlement and Risk Management Solutions to Financial Institutions

We intend to further commercialize X-Net by making our proprietary global settlement and risk management solutions accessible to qualified financial institutions worldwide. This initiative will enable financial institutions to leverage our proven, scalable infrastructure and enhance their own cross-border service offerings. By acting as a technology and compliance service provider for the broader financial ecosystem, we can extend our reach beyond our direct SME customer base to support businesses of all sizes in the broader cross-border trade market, including those already served by financial institutions. This will further strengthen our network effects and significantly expand our total addressable market.

### Invest in Emerging Technologies

We plan to implement privacy-enhancing technologies to build a compliant cross-border data framework for our global operations. This initiative will enable secure analysis of encrypted transaction data across jurisdictions without exposing raw information. By integrating multiparty computation and homomorphic encryption, we will navigate complex international data regulations proactively.

Furthermore, we will invest in edge computing infrastructure to decentralize processing nodes across key international markets. By processing data locally at the network edge, we achieve faster transaction confirmations and enhanced service availability. This approach can optimize user experience by lowering latency for overseas users and establish a high-performance foundation to support global expansion.

In addition, we will invest in blockchain technology to address the pain points of traditional B2B cross-border trade payments. Our solutions on blockchain networks aim to significantly reduce transaction fees, enable real-time settlement, and enhance security and transparency for SMEs. We will adapt our compliance and risk control frameworks to blockchain infrastructure while proactively engaging with regulators to ensure full licensing.

## OUR SERVICES

### Overview

Over the years, we have introduced a comprehensive range of payment services and value-added services tailoring to the need of SMEs, addressing their core accessibility challenges in cross-border trade payment. During the Track Record Period, we primarily derived revenue from provision of payment services to SMEs. We also derived a portion of our revenue from interest income on client funds. For details, see “— Customers and Suppliers — Our Customers” and “Financial Information — Description of Major Components of Our Results of Operations — Revenue.” For details on breakdown of our revenue by business nature in absolute amounts and as percentages of total revenue, see “Financial Information — Description of Major Components of Our Results of Operations — Revenue.”

### Payment Services

We offer payment services to SMEs, enabling them to efficiently and securely settle cross-border payments with their overseas counterparties. Our payment services are delivered through an integrated platform combining digital wallet functionalities with a globally unified settlement network and risk management platform. This enables our customers to manage their funds in a streamlined manner without working with multiple banks and intermediaries. Our payment services facilitate the entire process of B2B cross-border trade payment from initial account setup, global and local collection, foreign exchange conversion to pay-out and withdrawal. Our core offerings include:

- *Pay-in services* that allow SMEs to collect funds from their trade counterparties or top-up funds to their collection accounts accessible on our platform in major currencies and/or various local currencies;

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- *Foreign exchange services* in connection with trade payment transactions under which we help SMEs convert funds in their collection accounts into designated currencies of their choice in accordance with relevant laws and regulations; and
- *Pay-out and withdrawal services* that allow SMEs to withdraw funds to their bank accounts and/or pay to third parties for merchandise, marketing, logistics and other services expenses.

Set forth below is a typical customer journey for utilizing our payment services to settle cross-border trade payments:

- *Registration and verification.* Customers begin by signing up via our APP or website (SME-facing digital wallets) and completing a digital business verification process. As per the applicable regulatory requirements, we verify qualifications on both the enterprise and the beneficial owners, ensuring robust compliance with regulatory requirements, including KYC and AML. Once the verification is completed, customers are eligible to access our services.
- *Creating collection accounts.* Once verified, customers can apply for collection accounts maintained at our platform. We offer two types of collection accounts: global collection account and local collection account. For details, see “— Pay-in Services.”
- *Pay-in.* After setting up their collection accounts, customers can begin receiving trade payments from their foreign trade counterparties or topping up funds themselves for subsequent pay-out and/or withdrawal. The funds can be settled in various global and local currencies. Payments collected to local collection accounts are typically credited on an instant or same-day basis, while payments collected to global collection accounts are generally processed within one to three working days.
- *Currency conversion.* Customers can convert currencies to facilitate smoother payments. Currency conversion is available online 24/7 and typically can be completed almost instantly.
- *Pay-out and withdrawal.* Customers can also use our platform to send payments to either their bank accounts or to third-party’s bank accounts. The processing time for pay-out depends on the destination and payment channel used. Renminbi settlements to bank accounts in Chinese Mainland are typically completed in near real-time, while other cross-border pay-out and/or withdrawal are generally processed within one to three working days.

Payment services are core drivers of our revenue growth. The following table sets forth the transaction volumes processed through our platform for the years indicated.

	For the year ended December 31,		
	2023	2024	2025
TPV ( <i>US\$ in millions</i> ) <sup>(1)</sup> . . . . .	18,633	32,618	60,516
FX volume ( <i>US\$ in millions</i> ) . . . . .	12,969	24,284	46,526
Pay-out and withdrawal volume ( <i>US\$ in millions</i> ) . . . . .	18,318	32,087	59,215

*Note:*

(1) While we do not directly monetize TPV, we consider TPV the most important operating metric because TPV demonstrates the overall magnitude of our platform and ultimately translates into foreign exchange volume and pay-out and withdrawal volume, which we actually monetize. For further details on our monetization strategy for payment services, see “— Revenue and Pricing.”

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The following table sets forth certain customer metrics of our platform as of the date and/or the years indicated.

	As of/For the year ended December 31,		
	2023	2024	2025
Cumulative registered customers . . . . .	418,482	593,139	826,908
Annual active customers . . . . .	82,614	111,368	148,952
TPV per active customer (US\$) . . . . .	225,540	292,883	406,280
Revenue from payment services per active customer (US\$) . . . . .	1,056	1,167	1,398
Platform monetization rate (%) . . . . .	0.47	0.40	0.34

During the Track Record Period, we witnessed significant growth in TPV, customer base and TPV per active customer. Such growth was driven by our continuous business and technological innovations, as well as the expansion of our global financial institutions network, improvements in our settlement capabilities and risk management systems, and the increasing digital adoption of cross-border payment solutions by SMEs engaged in cross-border trade.

Our platform monetization rate (measured by our payment services revenue as a percentage of our TPV) experienced a modest compression during the Track Record Period despite the rapid growth of our TPV and total revenue. This reflected a deliberate, reasoned volume-based pricing adjustment for our pay-out and withdrawal services (where we charge our SME customers service fee based on their pay-out and withdrawal volume) to remain competitive amidst an evolving industry landscape, especially in terms of attracting and retaining certain premium customers. Our success in customer acquisition and engagement was demonstrated by the fact that our TPV per active customer increased from US\$225,540 in 2023 to US\$292,883 in 2024 and further to US\$406,280 in 2025 and our revenue from payment services per active customer steadily increased from US\$1,056 in 2023 to US\$1,167 in 2024 and further to US\$1,398 in 2025.

With our strong service capability and enhanced reputation, we expect our platform monetization rate to reach a point of stabilization based on our quarterly operational results in 2025. With this stabilization trend, we expect our primary driver of top-line revenue expansion will continue to be the sustained, high-velocity growth of our TPV. By capturing a larger market share, our platform is expected to ensure that the rapid scaling of TPV will not only offset historical pricing adjustments, but would further sustain overall revenue growth and reinforce our market position.

### *Pay-in Services*

We provide pay-in services, enabling SMEs to collect funds in widely recognized major currencies, and/or local currencies in various markets for sales of goods across various industries.

Pay-in refers to the fund inflow process through which businesses transfer funds into the collection accounts on our platform. Funds are typically received from our customers’ downstream business counterparties in connection with underlying cross-border trade transactions. In certain circumstances, our customers may also top up their collection accounts using their own funds to support subsequent pay-out activities where available balances are insufficient. The pay-in stage governs how funds are introduced into our payment network and forms the starting point of the end-to-end payment flow. These transactions are supported by our proprietary settlement network, X-Net, which connects global financial institutions with our platform and enables SMEs to receive cross-border payments through a unified settlement infrastructure and risk management platform. See “— Our Settlement Network and Technology Infrastructure” for details. Our pay-in services are mainly carried out in the following ways and are renowned for our local and global collection capabilities.

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### *Local Collection: Payment to Local Account in Local Currency*

We support end-to-end transactions in local currency by directly connecting sender and recipient banks through X-Net in 56 countries and regions as of March 31, 2026. According to CIC, we provide the broadest geographical coverage for local currency collection in the B2B cross-border trade payment industry. Through our local collection capabilities, SMEs on our platform are able to set up dedicated local collection accounts, receive trade payments in local currencies in markets where international bank coverage is inefficient or foreign exchange liquidity is limited. The proportion of payment transaction counts processed through local collection experienced significant growth during the Track Record Period, increasing from 16.0% in 2023 to over 50.0% in 2025.

Traditional cross-border bank transfer relies on a correspondent banking network that typically involves lengthy and complex transaction processes, multiple intermediaries, high transaction costs and limited service support for SMEs. In addition, traditional international banks may not have significant presence in all countries and regions. SMEs frequently face inadequate service coverage and payment challenges, particularly in emerging markets where regulators usually impose strict foreign exchange controls and local banking systems often lack sufficient foreign reserves or maintain lengthy and costly settlement cycles. Given the inaccessibility of settlement in major currencies, many exporter SMEs seek to settle payments in their local currencies, but nonetheless encounter severe difficulties. As a result, many SMEs turn to unlicensed money service operators which expose them to risks such as fund freezes, money laundering allegations, and account suspensions.

Through partnerships with local financial institutions, we mitigate these issues by routing payments across local financial institutions end-to-end, facilitating secure local currency collections, followed by efficient currency conversion, ultimately enabling seamless repatriation of funds to exporters’ bank accounts in a compliant manner. By enabling exporters to transfer funds directly in their local currency, our local collection capabilities significantly lower barriers to cross-border trade payment, improving service accessibility, ensuring service continuity, alleviating foreign exchange shortage, reducing associated costs and shortening settlement cycle.

The key differentiator of our local currency collection capabilities lies with X-Net, a standardized infrastructure that connects a wide network of participating banks and financial institutions. X-Net directly connects local settlement networks and payment schemes across different markets, enabling local collection and settlement in local currencies without reliance on traditional correspondent banking network for cross-border trade payments.

For example, Chinese exporters selling goods to overseas importers in Nigeria previously faced difficulties in receiving funds from Nigerian importers because such importers may not maintain bank accounts at international banks with major currencies. We, by connecting local financial institutions in Nigeria through X-Net, allow Chinese exporters to open Nigerian local collection accounts on our platform. As a result, Nigeria importers can directly transfer funds to the Chinese exporter’s local collection accounts. Upon receipt, the funds enter our settlement network, where we utilize global FX liquidity resources to enable conversion of local currencies into designated currencies of our customers, within a compliant framework.

### *Global Collection: Payment to Global Account in Major Currency*

We partnered with financial institutions and leveraged existing settlement networks to provide payment services in major currencies across more than 200 countries and regions as of March 31, 2026. Through these partnerships, we enable SMEs to establish dedicated global collection accounts in major currencies on our platform, thereby reducing their needs to open such accounts directly with these financial institutions. Our global collection processes are designed to reduce the burden associated with account opening and maintenance while improving the efficiency and accessibility of cross-border collections for SMEs. Through a standardized yet robust onboarding process, we are typically able to assist customers in establishing collection accounts on our platform within 24 hours. This significantly enhances convenience, speed and accessibility, empowering SMEs with global collection capabilities.

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Once a global collection account is opened, SMEs may provide the relevant account information to their foreign trade counterparties for settling payments arising from underlying cross-border trade transactions. Payments are made by such counterparties in the agreed major currency directly to the collection account designated by the SMEs, and the funds are credited into the SME’s collection account on our platform for subsequent use, including currency conversion or pay-out and withdrawal.

For example, a Singaporean exporter selling goods to an Indonesian importer may provide information of a USD collection account opened at our platform to such importer. With account details, the Indonesian importer can make trade payment in USD to that collection account through its own bank account (typically our financial institution partners), and the funds are subsequently reflected in the exporter’s collection account, leveraging the network of our financial institution partners.

### *Foreign Exchange Services*

We provide foreign exchange services to our customers to facilitate their pay-in as well as pay-out and withdrawal transactions. If multiple currencies are involved, customers may choose to utilize our foreign exchange services to ensure the correct conversion and efficient transfer of funds.

By leveraging various fund flows and trade data generated through our platform, we maintain liquidity resources across multiple currencies and markets. Our systems anticipate liquidity needs and dynamically and efficiently help our customers source available foreign exchange supplies based on market rates. This information-driven sourcing capability enhances liquidity efficiency on our platform and supports timely foreign exchange conversion for our customers.

We provide 24/7 real-time online currency exchange based on market rates through partnerships with financial institutions. All currencies available for pay-in, pay-out and withdrawal transactions, including transactions involving minor currencies, can be exchanged into major currencies, such as HKD, USD, CNY, and EUR.

### *Pay-out and Withdrawal Services*

Upon further verifying the authenticity and consistency of the relevant pay-out and withdrawal transactions, we then provide pay-out and withdrawal services to our customers, allowing them to initiate pay-outs to third parties such as suppliers and business partners or withdraw to their bank accounts. Our customers can initiate instructions to withdraw the funds to their bank accounts. If different types of currencies are involved, they may choose to use our foreign exchange services during the withdrawal process. The funds move from collection account to the customers’ bank account. For details on foreign exchange services, see “— Foreign Exchange Services.”

Customers may also direct pay-outs to third-party’s bank accounts, such as those of suppliers or partners, facilitating the settlement of merchandise, marketing, logistics and other service expenses. Foreign exchange services are also available in these cases. The funds are processed through our platform and sent to the designated third-party’s bank accounts, ensuring secure and timely transactions.

### *Revenue and Pricing*

We generally do not charge customers a separate service fee for pay-in services that allow funds to be received into collection accounts. These services are primarily designed to facilitate customer onboarding, attract and retain SMEs onto our platform, and enable customers to efficiently access our payment network. Our monetization strategy is centered on increasing the TPV processed on our platform and monetizing such payment volume through our foreign exchange services and payout or withdrawal services, which such TPV ultimately translates into.

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We facilitate foreign exchange transactions for our customers and charge service fees, which are generally calculated on a percentage basis.

We generate revenue from pay-out and withdrawal services by charging either (i) service fee on a percentage basis, generally subject to a capped rate of up to 0.4% of the transaction amount, depending on the agreement with the customers, or (ii) fixed fee on a per-transaction basis, typically ranging from US\$10 to US\$20 (or the equivalent amount in other currencies).

Our pricing strategy is largely market driven. Our service fee rate is typically determined by settlement processes, market rates of competitors, customers’ business scale and our commercial relationship with them, among others. We may grant discretionary discount to certain premium customers who processed a large volume of transactions on our platform. For details, see “Financial Information — Year-to-Year Comparison of Results of Operations.”

### Value-Added Services

We also offer a wide variety of value-added services to complement our payment services and help meet the diverse needs of SMEs in accordance with relevant laws and regulations in their respective jurisdictions. Our value-added services mainly include (i) treasury management services where we help SMEs outside Chinese Mainland manage cash in their collection accounts through referring SMEs to third-party fund management companies, and (ii) software services, where we develop and deliver software tailored to business scenarios of many SMEs to meet their digital operation needs.

Our treasury management services are designed to assist our customers outside Chinese Mainland in managing their cash holdings efficiently. After funds are received in the collection accounts, our customers are able to use these funds to purchase multi-currency money-market funds in accordance with relevant laws and regulations in their respective jurisdictions. Those funds will be transferred to the third-party fund management companies. By partnering with Hong Kong-based fund management companies, we offer customers access to investment opportunities. We charge service fees to fund management companies based on a fixed percentage of the daily net asset value of the funds under management. Revenue from treasury management services is recognized over time as the services are rendered.

During the Track Record Period, we also offered software services addressing the digitalization needs of our customers, such as intelligent management of client relationship management and data analytics services. We charge customers either on a subscription-basis or usage-basis. For subscription-based contracts, revenue is recognized on a straight-line basis over the subscription period. For usage-based contracts, revenue is recognized based on customers’ actual utilization of pre-purchased service units. We are making strategic adjustment of our software services. For details, see “Financial Information — Year-to-Year Comparison of Results of Operations.”

### OUR SETTLEMENT NETWORK AND TECHNOLOGY INFRASTRUCTURE

Our payment services and risk management capabilities are supported by a comprehensive technology infrastructure that we have developed to facilitate secure, efficient and scalable B2B cross-border trade payments. Through continuous investment in research and development, we have built an integrated technological ecosystem that connects SMEs and financial institutions, enabling seamless fund collection and settlement, currency conversion and pay-out and withdrawal across jurisdictions.

This technology infrastructure comprises several proprietary systems and platforms, including X-Net, our globally unified settlement network and risk management platform, TradePilot, our vertical AI model for cross-border trade payment, as well as supporting platforms such as XRN, Captain and Eagleeye. Together, these systems form the technological backbone of our platform, supporting transaction processing, risk management, product development and system stability across our global operations.

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### X-Net and Digital Wallet

B2B cross-border trade payment is predominately facilitated by bank transfers, relying on a traditional correspondent banking network with multiple intermediaries. However, traditional cross-border bank transfers have become increasingly inaccessible for SMEs. Banks face stricter compliance and risk control requirements, however, their limited AI capabilities and poor visibility into end-to-end trade data make effective AML and risk management complex and costly. As a result, serving SMEs is often found less attractive, leading to tighter onboarding standards, frequent service denials and interruptions. Even when funds from SMEs enter the banking network, the traditional correspondent banking network often results in slow transfers, high fees when money is moved across borders and often lacks of ability to adequately address FX shortage, particularly in emerging markets.

It is widely accepted that in the C2B payment market, card scheme-based settlement networks and digital wallet providers have transformed payment processing by connecting consumers and merchants to financial institutions for payment settlement and risk management, effectively replacing the reliance on the traditional correspondent banking network. In B2B cross-border trade payment market, no equivalent settlement network + digital wallet existed before due to the complexity to build such infrastructure. To change this, we built our proprietary globally unified settlement network with a digital wallet, enabling SMEs to transact directly with one another via a single platform.

X-Net, our globally unified settlement network, seeks to assist SMEs to access global payment networks. Through X-Net, we connect financial institutions and cross-border trade companies through a unified settlement framework, facilitating more efficient and compliant B2B cross-border trade payments. We further integrate X-Net with a digital wallet, allowing SMEs to manage fund collection, conversion and payment within a single platform. This integrated model allows SMEs to transact directly with one another through X-Net without relying on lengthy chains of correspondent banks, offering SMEs a unified, efficient solution for managing their cross-border transactions.

**Settlement network functionality.** We established XTransfer to address the significant pain points SMEs face in B2B cross-border trade payments, including low service accessibility, frequent bank account freezes or closures, foreign exchange shortage, long settlement cycles, and high fees. Through X-Net, we support local currency collection, centralize risk management and route payments across banks directly. As a result, X-Net reduces the need for intermediary banks, minimizes fees, and accelerates transaction times. For example, payments from SMEs in emerging markets to businesses in China, which traditionally involve five or more intermediary banks and several days for settlement, can now typically be processed within the same day through X-Net’s direct connectivity between the sender bank and the recipient bank. Furthermore, X-Net leverages AI technologies to digitalize and standardize risk control mechanism, which allows for expanded accessibility for SMEs while maintaining strict compliance standard. As a result, SMEs can transact easily, directly and swiftly with one another across borders in a single platform.

X-Net, through integrating FISS (Funds Instruction Set for Settlement), enables us to set global standards for interoperability and technical interfaces in B2B cross-border trade payments. The FISS embedded within X-Net is designed to standardize key aspects of cross-border trade payment settlement through APIs, including KYC procedures, fund flows, foreign exchange conversion, and liquidity perdition and management. By adopting the standards and technical interfaces of FISS, participating financial institutions can enhance their digital capabilities to process B2B cross-border trade payments for SMEs in a manner that is interoperable with other participating financial institutions.

Benefiting from the above architecture, X-Net becomes the world’s first and only globally unified B2B cross-border settlement network and risk management platform, according to CIC.

- *Global.* X-Net is the only proprietary B2B cross-border trade payment settlement network with true global connectivity, according to CIC. We support end-to-end settlement of payment transactions in local currency by directly connecting sender and recipient banks through X-Net — our proprietary unified settlement network — in 56 countries and regions as of March 31, 2026. Furthermore, through partnership with international banks, we also leverage their existing settlement networks to provide payment services across more than 200 countries and regions, enabling SMEs to settle cross-border trade transactions in major currencies.

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- *Unified standard.* Beyond its extensive geographic and currency reach, X-Net is the world's only truly "unified" settlement network in B2B cross-border trade payments, according to CIC. This unified network is a singular infrastructure where all participants are connected to a common platform administered by us. We establish and enforce universal standards across the entire network, including (i) technical interfaces & connectivity, and standardized APIs for seamless integration, (ii) uniform protocols for transaction processing, and (ii) centralized AML, KYC, and risk management. By processing transactions through this singular set of standards, X-Net achieves faster, lower-cost settlements while maintaining superior compliance oversight.

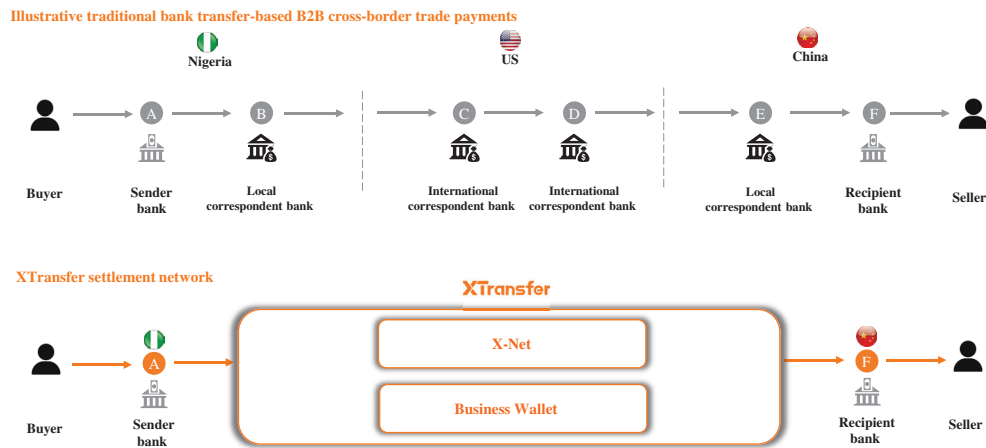
*Digital wallet functionality.* X-Net supports a simple, easy-to-use digital wallet, enabling SMEs to receive, convert and send funds at fingertips. A digital wallet turns X-Net from a back-end settlement infrastructure into a front-end easy-to-use wallet experience for SMEs, enabling instant, cross-border payments within a single interface without working with multiple banks and intermediaries. Because digital wallet is integrated within the globally unified settlement network and risk management platform, payments are settled faster with real-time confirmations and fewer intermediaries. Digital wallet also functions as an integrated ledger, linking different bank accounts and tracking fund flows to make automatic reconciliation and verification of wallet balance possible. Compliance is further enhanced, as onboarding and transaction activities generate valuable data for KYC/AML, ongoing monitoring, and sanctions screening. In addition, the wallet provides a tangible platform for advanced products and services built around the customer's needs, creating opportunities to offer additional financial services.

The integration of our settlement network and digital wallet creates important operational synergies:

- *Transforming back-end infrastructure into front-end experience:* X-Net provides important payment infrastructure. However, without a user-friendly interface, it would remain a behind-the-scenes tool accessible only to large and seasoned enterprises and financial institutions. The digital wallet bridges this gap by turning X-Net into a "front-end wallet experience". SMEs can interact with the network intuitively via a single APP, collecting, converting and transferring money across the borders at fingertips.
- *Enhanced speed, efficiency and cost savings:* The settlement network handles the settlement of funds across borders with fewer intermediaries, while the digital wallet provides real-time visibility and control. Together, they eliminate bottlenecks: payments are settled faster because the digital wallet is directly integrated with X-Net, reducing the need for manual interventions or multi-bank hops.
- *Improved compliance, risk management, and data integrity:* While X-Net centralizes risk management, the digital wallet further strengthens it by generating additional data during onboarding and by reconciling and verifying fund flows against trade documents stored in the wallet (for example, invoices, purchase orders, and logistics records). This allows for better KYC/AML monitoring and sanctions screening, enhancing payment compliance and security.
- *Self-reinforcing cycle of growth:* A superior digital wallet experience, featuring instant transfers, real-time confirmations, and automated reconciliation, attracts more SMEs, whose growing transaction volumes attract additional financial institutions to join the settlement network, expanding its reach and efficiency. This broader settlement network, in turn, draws even more SMEs by enabling faster, cheaper cross-border payments. During the process, accumulated data enhances AI-driven risk management, including KYC/AML and fraud detection, delivering seamless customer experience that builds trust, attracts more financial institutions, and accelerates growth.

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The following diagrams set forth illustrative settlement mechanism of traditional bank transfer-based B2B cross-border trade payments, and the transaction flows of X-Net’s settlement network + digital wallet for a typical local collection transactions.



As a result, our proprietary X-Net + digital wallet brings unparalleled advantages:

- Direct connections to the financial institutions of senders and recipients significantly shorten settlement routes by reducing reliance on multiple intermediary banks and settlement institutions.
- Standardized interactions between financial institutions with uniform APIs enhance service interoperability and align risk assessment among participating financial institutions.
- With a proprietary settlement network, we maintain full visibility into verified relationships between senders and recipients and associated data, resulting in enhanced data capabilities and knowledge map that can enhance our risk control capabilities.
- As our platform continues to grow, we are able to better monitor foreign exchange transactions, particularly those involving local currencies. Through X-Net, we aggregate liquidity resources from our global network of financial institution partners and transaction flows across our platform, which enhance foreign exchange availability across different markets, including emerging markets.

The power of X-Net with a digital wallet is evidenced by X-Net’s rapid growth, with annual active customer increased from 82,614 in 2023 to 148,952 in 2025, TPV nearly tripling from \$18.6 billion in 2023 to \$60.5 billion in 2025 and the number of partner financial institutions increased from 28 as of December 31, 2023 to 171 as of March 31, 2026.

### TradePilot

We developed TradePilot, the world’s first and most advanced vertical AI model for B2B cross-border trade payments, according to CIC, exhibiting significantly stronger cross-border trade domain knowledge and superior recognition capabilities for unstructured cross-border trade documents compared with many global general-purpose large language models.

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TradePilot provided unparalleled capabilities in addressing the core challenge of B2B market — risk management. It is continuously trained on large volumes of high-quality proprietary data to (i) convert unstructured, multimodal data into structured information, (ii) synchronize fund and information flows, and (iii) automate risk monitoring for highly complex B2B payment transactions. TradePilot outperforms general-purpose AI models in terms of recognition speed and accuracy metrics, according to CIC. Furthermore, TradePilot significantly outperformed AI capabilities of traditional banks in terms of automatic transaction review (98.5% as of March 31, 2026 as compared to below 50% in traditional banks), according to CIC. The enhanced ability to resolve risk management challenges enables us to become the largest B2B trade payment platform globally that facilitates B2B cross-border trade payments at scale while reducing risk exposures.

TradePilot has been trained using our massive, high-quality transaction data, which is often not readily accessible to many other models and represents a key constraint in the development of sophisticated models. We mitigate this constraint by drawing on our multi-year, high-quality of B2B cross-border trade payment data. These high-quality data accelerate initial training. After deployment, the model ingests ongoing user feedback and interaction data, establishing a virtuous flywheel that continuously enhances performance. As of December 31, 2025, we have processed over nine million B2B cross-border pay-in transactions, and more than 10 million offline, unstructured foreign-trade documents.

TradePilot is also verified by our proprietary, industry-first knowledge map dedicated to the cross-border trade industry, reducing model hallucination. The knowledge map serves two core functions: (i) they operate as TradePilot’s structured industry knowledge layer, injecting accurate, domain-specific context into the model’s reasoning to reduce hallucinations and increase decision precision; and (ii) they strengthen digital risk controls by revealing relationships among enterprises, products, and industry connections, supporting AML and anti-fraud monitoring. The knowledge map combines scale and granularity: as of December 31, 2025, such knowledge map includes approximately 30 million enterprise entities. In total, it contains approximately 19 million mapped relationships, including information on upstream-downstream value chains, hundreds of thousands of products, know-how with respect to approximately 100 industries as of December 31, 2025.

By adopting AI-driven solutions, we have transformed previously manual, burdensome risk and compliance tasks into streamlined, automated operations, processing complex trade information, detecting anomalies with greater precision, and delivering faster, more cost-effective, and reliable risk oversight. We comprehensively apply TradePilot during our business operations, including customer onboarding, risk management and compliance, fraud detection, foreign exchange management, payment processing, sales support and customer service:

- ***Risk management and compliance from onboarding through ongoing monitoring.*** We use TradePilot to support customer onboarding, transaction review and ongoing monitoring. Through AI-enabled data processing, document analysis, anomaly detection and cross-data validation, TradePilot helps enhance the efficiency and consistency of our risk control and compliance procedures.
- ***Fraud detection during collection.*** During the payment collection stage, TradePilot assists in validating transaction information and identifying potentially suspicious or fraudulent activities by analyzing customer communications, transaction details and supporting documentation.
- ***Foreign exchange management.*** We use TradePilot to monitor and process transaction flows in real time, ensuring accurate and timely currency conversion. TradePilot further optimizes decision-making for efficient and cost-effective exchange routes.
- ***Payment processing.*** During the payment stage, TradePilot supports transaction routing and processing by helping optimize payment pathways and facilitating the identification and interception of suspicious transactions.

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- **Sales and customer service.** We use TradePilot to analyze customer service interactions, improve response quality and efficiency, and generate customer insights that support more targeted customer engagement, account management and service enhancement. Since integrating TradePilot, the automatic customer service resolution rate has risen from 13% in 2023 (prior to launch of TradePilot) to over 88% in 2025, significantly improving user satisfaction and operational scale.

We believe these applications enhance our operational efficiency, strengthen our risk management and compliance capabilities, improve customer experience and support the scalability of our platform.

### **XRN**

XRN is a proprietary and all-in-one ToB APP development platform. It provides a unified framework for APP development, deployment and iteration. It enables us to develop and maintain APP across multiple operating systems, including iOS and Android, in a more standardized and efficient manner, thereby improving development efficiency and reducing the maintenance complexity associated with multi-platform application deployment.

According to CIC, XRN is the world’s only one-stop ToB APP development platform for cross-border trade payment. With XRN, we can develop ToB APP more efficiently, enabling us to rapidly expand product features into markets with extensive use of mobile phones (such as Africa and South America), significantly enhancing APP’s convenience features and timeliness.

### **Captain**

Captain is a self-developed R&D and operations management platform, enabling us to rapidly and seamlessly upgrade features across all global sites, ensuring that new functionalities are deployed efficiently and without disrupting users. Our hybrid multi-cloud architecture is a key strength of our business continuity system. By centralizing code management, customizing deployments for each site, and monitoring data across multiple clouds and data centers, we ensure seamless system upgrades which require only a single code update for global implementation. Captain’s global rolling deployment facilitates one-click product upgrades and ensures that all feature updates are synchronized across every global site, making new functionalities available worldwide within one week.

### **Eagleeye**

Eagleeye is our proprietary business continuity and emergency response platform, which delivers uninterrupted, reliable cross-border payment services. Eagleeye is designed to address extreme contingency scenarios, including catastrophic failures at cloud service providers or disruptions at our level. In the event of such incidents, Eagleeye ensures the uninterrupted provision of stable and reliable cross-border trade payment and collection services for our customers. In 2025, the overall availability rate reached 99.998%, meaning users would experience less than 10 minutes of downtime on the platform throughout the entire year.

## **OUR BUSINESS PARTNERS**

We collaborate with a broad network of business partners to support the operation of our platform and the provision of our payment and value-added services. These partners provide us with access to payment infrastructure, financial services, compliance data and other operational capabilities that complement our platform and enable us to deliver comprehensive payment and other value-added services to SMEs globally.

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Our key business partners primarily include (i) financial institutions that provide international banking, settlement, foreign exchange and local payment processing services across multiple jurisdictions, (ii) risk management data service providers supporting our customer due diligence and compliance procedures, and (iii) fund management companies offering investment products available through our platform.

### Financial Institutions

We collaborate with financial institutions that provide international banking, settlement, local payment processing and foreign exchange services across multiple jurisdictions. Together with such financial institutions, we provide payment services across more than 200 countries and regions as of March 31, 2026, enabling SMEs to settle cross-border trade transactions in major currencies. As of December 31, 2023, 2024 and 2025 and March 31, 2026, we cooperated with 28, 61, 148 and 171 financial institutions, respectively.

Through these partnerships, we enable SMEs to establish dedicated global collection accounts in major currencies on our platform, without the need for such SMEs to independently open and maintain accounts with multiple international banks. Leveraging the infrastructure and settlement capabilities provided by these financial institutions, we offer a streamlined onboarding process that allows eligible SMEs to commence major currency collections typically within a few days. These arrangements enhance the convenience and accessibility of cross-border trade payments for SMEs by allowing them to receive payments from overseas counterparties in major currencies through a unified platform, thereby facilitating efficient and compliant international transactions.

In addition, we collaborate with various local financial institutions to provide end-to-end settlement of payment transactions in local currency by directly connecting sender and recipient banks through X-Net — our proprietary unified settlement network — in 56 countries and regions as of March 31, 2026. Such financial institutions generally have a distinct advantage over international financial institutions when it comes to providing local currency liquidity, localized services and communicating with local customers and regulators. Through these partnerships, we establish dedicated local collection accounts for SMEs on our platform, enabling them to receive payments from counterparties in local currencies, particularly in markets where access to international banking services may be limited. These arrangements help SMEs, especially those operating in emerging markets, address challenges such as foreign exchange shortage at local banks, lengthy settlement cycles and high currency conversion fees. By facilitating secure local collections through regulated financial institutions and integrating such funds into our payment system for compliant currency conversion and onward pay-out and withdrawal, we reduce SMEs’ reliance on unlicensed money service operators and mitigate associated compliance and fund security risks.

In connection with such arrangements, we compensate our partner financial institutions under different fee models depending on the nature of the services provided and the relevant market practice. These fee arrangements may include (i) fees calculated as a percentage of transaction volume, or (ii) fixed fees charged on a per-transaction basis. The applicable fee structure varies by partner, currency pair and service type.

The below sets forth material terms with financial institution partners.

- *Company’s covenant.* We shall conduct customer and transaction screening to verify authenticity and ensure compliance. We are required to implement and maintain transaction-authenticity verification systems that monitor and detect fraudulent activity on a real-time basis.
- *Term and renewal.* Agreements with financial institutions generally have an initial one-year term and renew automatically unless either party provides written notice of non-renewal.
- *Confidentiality and data protection.* Both parties are obligated to protect confidential and personal information received from the other. We must implement appropriate security measures and take reasonable precautions to prevent misuse, unauthorized or inadvertent disclosure, or loss of confidential information.

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- *Termination rights.* Financial institutions may terminate the agreements if (i) we are materially in breach of the agreements, (ii) our customers or we engage in activities that violate the laws or regulations, or (iii) financial institutions could not provide the services under such agreements pursuant to applicable laws in relevant jurisdiction or are requested by competent authorities.

### **Risk Management Data Service Providers**

We collaborate with third-party data service providers to support our risk management and compliance procedures across multiple jurisdictions. These service providers supply data and screening capabilities that are integrated into our customer onboarding, transaction monitoring and ongoing compliance processes, including sanctions screening, ultimate beneficial owner identification, enterprise verification and transaction risk monitoring for customers. Through these arrangements, we enhance the efficiency and consistency of our risk management and AML procedures while supplementing our internal risk control capabilities with external data sources.

We generally pay service fees to these data service providers pursuant to commercial arrangements entered into in the ordinary course of business, which may include subscription-based fees, usage-based charges or other service fees depending on the scope and nature of the services provided.

### **Fund Management Companies**

We collaborate with fund management companies by referring customers on our platform in connection with treasury management services. Through these partnerships, eligible customers outside Chinese Mainland may subscribe for selected money market fund products using balances held in their collection accounts, subject to the applicable investment terms and minimum subscription requirements of the relevant products. These arrangements provide customers outside Chinese Mainland with additional options for managing temporarily idle balances within our platform.

We charge fund management companies based on a fixed percentage of the daily net asset value of the funds under management.

The below sets forth material terms with fund management companies.

- *Company covenant.* We shall continue to conduct our business in compliance with all applicable laws, regulations, business conduct rules, record-keeping requirements, and any rules, codes and guidelines issued by relevant regulatory authorities regarding customer identification verification, client suitability assessments, and/or promotional materials.
- *Term and renewal.* Agreement remains in effect until terminated by either party upon advanced prior written notice to the other party.
- *Confidentiality and data protection.* Both parties shall protect all confidential and personal information received from the other party. We shall implement appropriate security measures and take reasonable precautions to prevent the misuse, unauthorized or accidental disclosure, or loss of confidential information.
- *Termination rights.* Either party may terminate the agreements if: (i) either party is in material breach of the agreements; (ii) either party commits fraud, wilful misconduct, or a material violation of applicable laws or regulations; or (iii) termination is required by any applicable law, rule, regulatory authority or governmental body.

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### OUR RISK MANAGEMENT CAPABILITIES

B2B cross-border trade payment carries a distinct risk profile, including sanctions risk, fraud risk, money laundering risk, and compliance risks regarding prohibited and restricted items in specific industries. Many processes remain offline, transactions involve multiple intermediaries, and key information is scattered across trading parties, logistics providers, customs authorities and financial institutions. Data are often fragmented, delayed, and difficult to verify. In addition, SMEs, our primary customer base, generally have less standardized transaction patterns and limited compliance resources compared with large corporations. These characteristics make it more difficult to assess the authenticity of trade transactions and detect abnormal activities using methods adopted by traditional banks. Traditional banks rely on paper records and manual reviews, which makes it hard to assess risks associated with SMEs efficiently and at scale, especially when the global AML regulations are becoming more stringent, imposing additional compliance pressures on traditional banks. Access to reliable and competitively priced cross-border trade payment services has therefore been limited for many SMEs. To address these challenges, we have developed a comprehensive risk management framework combining regulatory compliance expertise, proprietary technology infrastructure and multi-layered organizational oversight. As of March 31, 2026, we have achieved market-leading fraud detection with a fraud rate as low as 0.003%.

***Comprehensive licensing coverage.*** Our compliance-first philosophy and rigorous risk management form the cornerstone of our business success and competitiveness. We are committed to full compliance with local regulatory frameworks while operating a global footprint. To effectively operate across these diverse jurisdictions, we maintain strong relationships with local authorities and global/local financial institutions, ensuring a clear understanding of country specific regulatory frameworks. As of March 31, 2026, we have obtained required licenses in key jurisdictions, encompassing Chinese Mainland, Hong Kong, the United Kingdom, the United States, Singapore, Netherlands (allowing us to provide electronic money and payment services across all 30 EEA countries under passporting), Australia and Canada. We are actively pursuing additional licenses in high-growth markets to broaden our compliant footprint. In jurisdictions where we do not hold a payments license, our B2B cross-border trade payment activities are conducted in partnership with locally licensed institutions, operating under relevant regulatory clearances and supported by local legal counsel to ensure full compliance with applicable laws and regulations.

***Experienced and specialized risk management team.*** We have a highly experienced risk management team consisting of over 300 specialists as of December 31, 2025, with over 45% holding a master's degree or above. Many members of our risk management team have prior experience at well-known financial institutions and leading internet platforms, and bring substantial expertise in compliance, AML, fraud detection and data-driven risk control. This experience enables them to anticipate and respond promptly to emerging trends and evolving risks in the payments landscape. Our sales team, supported by risk-aligned incentive mechanisms, is incentivized to complement the risk management team by acting as the first line of defense, proactively identifying risks at the earliest stage to ensure strong mitigation from the outset.

The organizational structure of our risk management mechanism comprises three lines of defenses.

- ***Business team.*** Frontline staff across our business development, operations and other departments are trained and responsible for identifying potential customer risks in the course of their day-to-day interactions with customers. Risk control indicators are incorporated into employee performance evaluations, and material risk incidents may result in corresponding adjustments to their performance evaluation, thereby reinforcing accountability for compliance alongside our business growth.
- ***Risk control and compliance team.*** Our risk control experts provide professional oversight of customer due diligence, monitor ongoing transactions and AML measures, formulate risk control strategies and optimize overall risk management processes.

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- *Internal audit team.* Our internal audit team conducts regular reviews and evaluations of the first two lines of defense to assess whether policies are effectively implemented and whether related processes are operating effectively and in compliance with applicable requirements.

**Data-driven and AI-enabled risk management.** Our risk management capabilities are supported by the extensive accumulation of proprietary trade and transaction data generated through our platform. As of December 31, 2025, our proprietary knowledge map covered approximately 30 million enterprise entities, 19 million mapped relationships and industry know-how across approximately 100 industries, enabling us to capture relationships among enterprises, products and trade patterns. Leveraging this data foundation, we utilize AI-driven algorithms to process and standardize large volumes of structured and unstructured data with speed and accuracy. As of March 31, 2026, 51 AI agents were built into our review processes, enabling risk assessments across diverse cross-border trade scenarios. For further details on our AI capabilities, see “— Our Settlement Network and Technology Infrastructure — TradePilot.”

Our AI-enabled risk management capabilities include three pillars of AI risk control:

- *Data integration.* Customer-related information is collected from multiple sources, including customer-provided materials, external websites, and third-party data providers. These information form the backbone of our proprietary data asset and knowledge map for risk management purposes.
- *Algorithm-based identification.* Data modeling, behavioral analysis, and algorithmic rules are used to automatically identify potential risks. TradePilot is deployed throughout the payment process to strengthen risk management and compliance. Through AI-driven solutions, we have converted a range of previously manual and time-consuming compliance tasks into more streamlined and automated processes, enabling more efficient processing of complex trade information, more precise anomaly detection and more timely, cost-effective and reliable risk management.
- *Human analysis and assessment.* Transactions identified by our systems as high-risk are escalated for further analysis and assessment by risk control experts. Insights derived from such reviews are then fed back into our algorithms, supporting ongoing refinement and improvement.

**Risk monitoring throughout customer lifecycle.** Our financial institution-grade risk control system spans the entire client lifecycle, encompassing pre-transaction KYC, in-transaction reviews and AML/anti-fraud checks, as well as continuous post-transaction risk monitoring. During customer onboarding, we conduct a comprehensive due diligence process comprising (i) KYC verification, including collecting and verifying key business information, including certificates of registration, corporate structure details, information of directors, ultimate beneficial owners and authorized persons, as well as relevant authorizations; (ii) screening against global sanctions lists, politically exposed persons and adverse media databases, with the screening scope covering company names, directors’ and ultimate beneficial owners’ names and relevant contact information capitalizing on technologies to better identify potential matches in complex scenarios, such as identical names, name variations and hidden related parties, and (iii) risk assignment, based on the results of such procedures, customers are assigned internal risk ratings (low, medium, high or extremely high), and enhanced due diligence measures are applied to higher-risk customers prior to approval.

Following onboarding, we continuously monitor our customers’ account activities to identify anomalous changes in transaction frequency, channels, currencies and amounts. Every transaction is subject to trade authenticity checks and risk screening before settlement. We also conduct comprehensive KYC/AML screenings across jurisdictions in collaboration with leading global compliance providers, bolstered by localized risk expertise. We have also established a customer complaint handling and incident response mechanism. Where customers report suspected unauthorized access or transaction issues, we

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promptly initiate escalation procedures, including account protection measures, transaction review and coordination with relevant financial institution partners, and implement appropriate remedial actions where necessary. Insights from such cases are incorporated into our systems to enhance ongoing monitoring and risk prevention.

### Case Studies

#### *Scenario One: Prevention of Third-Party Fraud*

Seller A, an exporter of daily necessities on our platform, received a payment from Sender C, which its counterparty Buyer B claimed was related to an underlying trade order. Upon receipt of the funds, our automated monitoring system detected anomalies and flagged the transaction for review. Our data analytics and AI-based risk models identified multiple inconsistencies, including irregular sender identity information, unusual payment remarks and deviations from the seller’s historical transaction patterns, indicating potential fraud risk. The transaction was escalated for manual investigation. We requested Seller A to provide supporting trade documentation, including inquiry records and payment evidence. Based on the materials provided, we reconstructed the transaction background and conducted further due diligence on Buyer B. The investigation revealed several red flags, including an unusually short negotiation timeline and an unexplained third-party payment arrangement between Buyer B and Sender C. We ultimately determined that Buyer B was a fraudster impersonating a legitimate buyer and Sender C, as a victim, was defrauded to make the payment. The funds were rejected and returned to Sender C, and the fraudster’s information and behavioral patterns were recorded in our internal risk database to strengthen future fraud detection and mitigate potential losses across our platform.

#### *Scenario Two: Detection and Prevention of Suspected Money Laundering Activity*

Seller Y is a company claiming to export daily consumer goods to Southeast Asia. Our automated monitoring system detected multiple anomalies, including unusually large inbound transaction volumes, irregular remitter identities, and atypical fund outflow patterns inconsistent with its stated business profile. The collection account was promptly flagged and escalated for manual review. During the investigation, we identified falsified supporting documents and adverse information unrelated to genuine trade activities, indicating a heightened risk of money laundering. Based on our assessment, we rejected the inbound funds, terminated Seller Y’s collection account, and recorded the company’s details, personnel information, and contact data in our risk database. We also conducted risk screening on related counterparties connected to Seller Y within our platform, thereby mitigating broader money laundering risks across our network.

## PRIVACY AND DATA SECURITY

The protection of privacy and data security is one of our highest priorities. We have designed a series of strict data security policies to ensure that the collection, use, storage, transmission and dissemination of data are in compliance with all applicable laws and regulations, optimize data governance, and protect the benefits of our customers, employees and other third parties. We have passed the ISO 27001 Information Security Management System certification (including annual surveillance audits), and obtained the National Level III Network Security Classified Protection certification and SOC2 audit reports. Our policies include data management, operational and maintenance procedures, and business system access controls. See “Regulatory Overview” for additional information on privacy and data security regulations.

- **Data Usage.** We mainly collect and store data relating to background information of customers, primarily including merchants and enterprises identification information such as address, contact information and licenses, which we obtained through KYC procedures, as well as transaction data when providing digital payment services, primarily including payment time, location, amount, channel, type and terminal of the transaction and transaction authorization information.

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- **Data Sharing and Transfer.** We do not share or transfer information and data collected or preserved by us to any person, except with prior explicit consent, or as otherwise required by applicable laws and regulations.
- **Data Protection.** We strictly limit and monitor our employee access to user data by implementing a robust internal authentication and authorization system. In addition, we adopt a range of technical measures, including encryption and anonymization, to safeguard the data entrusted to us. We also conduct regular data protection impact assessments and transfer impact assessments, complete required filings where applicable, and implement contractual arrangements and periodic audits in relation to intra-group data transfers and third-party data processing to ensure data security and regulatory compliance.
- **Data Security Awareness.** We also enter into confidentiality agreements with our employees. The confidentiality agreements provide that, among other things, our employees are legally obligated not to share, distribute or sell confidential information to any party, including other employees who otherwise have no access to such information. Our employees are also legally obligated to return all confidential materials in their possession upon cessation or termination of their employment and will remain obligated to maintain confidentiality of such materials thereafter. Our employees may be subject to penalty if they breach their confidentiality obligations or otherwise commit misconduct resulting in a leakage of confidential information. In addition, in scenarios involving data sharing or entrusted processing, we enter into appropriate agreements with third parties to clearly define their data protection obligations and responsibilities.
- **Cybersecurity Risk Management.** We operate robust application and infrastructure security controls, which are designed to prevent, identify and respond to information security threats. We have adopted a standard operation procedure to address any potential hacking or data leakage incidents.

During the Track Record Period and up to the Latest Practicable Date, we are in compliance with the applicable laws and regulations relating to user data privacy and security in all material respects.

## RESEARCH AND DEVELOPMENT

R&D is the driving force behind our innovation and growth. Our R&D activities mainly focus on the development of and upgrades to the market-pioneering technologies and platforms for B2B cross-border trade payment. Through continuous investment in R&D, we have enhanced operational efficiency, strengthened risk management capabilities and enhanced customer experience, which in turn supports the growth of our customer base, TPV and revenue. We boast a highly experienced R&D team of technical experts with extensive knowledge in their fields. As of December 31, 2025, we had 352 research and development employees, representing 11.3% of our total employees as of the same date. Among these R&D staff, 33% have obtained a master's degree or above, and many of them have substantial R&D experience with other renowned technological companies before joining us.

Our research and development process adopts an agile development approach, integrating domain expertise in cross-border trade payments with advanced technology development. R&D initiatives are typically driven by operational needs identified across our payment network, risk management operations and customer service processes, and are iteratively developed, tested and refined within specific operational workflows before broader deployment across our platform. Feedback from business operations and customer usage is continuously incorporated into subsequent system enhancements, enabling us to refine our technologies and improve their effectiveness over time.

Our key R&D projects primarily focus on enhancing our AI capabilities, strengthening risk management automation and improving the scalability of our globally unified settlement network and risk management platform. Set forth below are selected R&D projects during the Track Record Period.

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Key R&D Projects	Nature of R&D Activities	Key Benefits
TradePilot-LLM . . . .	Develop an AI model with deep cross-border trade payment expertise for risk management, payment automation and customer services	Increase the automated review rate and strengthen risk controls  Improve customer service efficiency and response quality as measured by customer service resolution rate
TradePilot-VLLM . . .	Develop multi-modal technology that rapidly identifies and analyzes large volumes of unstructured offline documents and trade records for KYC and transaction review	Raise the automatic transaction review rate  Shorten KYC time with the average completion time reduced from 37.4 minutes at the end of 2024 to 31.3 minutes at the end of 2025
AI Agent Platform . . .	Develop an AI agent platform built on TradePilot that enables business teams to quickly create agents to improve daily operations and support automated risk review	Improve risk management efficiency by automating KYC, payer profiling, and other risk management workflows
AI Customer Risk Rating . . . . .	Develop an AI driven customer rating system for risk management teams covering fraud and sanctions risk	Strengthen automated identification of high-risk customers
Intelligent Customer Services . . . . .	Develop intelligent customer service agents to autonomously resolve real-world customer issues	Reduce human intervention and increase customer service productivity as measured by customer service resolution rate
FISS Platform . . . . .	Develop a standardized and rapidly extensible interface for X-Net	Improve integration efficiency and scalability with global partners and local settlement networks. Results include a 40 percent reduction in average integration cost per financial channel in 2025 compared with 2024 and faster expansion of the X-Net network with partner institutions growing from 61 as of December 31, 2024 to 148 as of December 31, 2025

## SALES AND MARKETING

Sales and marketing play a critical role in the B2B cross-border trade payment industry. B2B cross-border trade payments involve complex operational processes such as foreign exchange management, regulatory compliance, trade documentation and settlement procedures. As a result, SMEs often require in-depth training, trust-building and ongoing support before adopting digital payment solutions. In addition, international expansion requires localized market knowledge and direct engagement with customers across different jurisdictions. These industry characteristics make a sizable and experienced sales organization essential for customer acquisition and market development. To address

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these needs, we maintain a field-based sales and marketing team dedicated to educating SMEs, supporting onboarding and strengthening trust in our platform, particularly in emerging markets where digital payment solutions for cross-border trade remain relatively new.

We adopt an omni-channel approach to customer acquisition and engagement, including face-to-face sales, social media marketing, participation in international and domestic trade fairs, and referrals from existing customers and third-party channel partners, such as business associations, logistics service providers and enterprise service providers. We believe this diversified approach enhances our market coverage and customer acquisition efficiency across industries and geographies.

We have built a highly efficient global sales organization that supports SMEs throughout the entire customer lifecycle, from initial engagement and onboarding to ongoing transaction support and relationship management. As of December 31, 2025, our sales team comprised over 2,000 professionals, representing the largest sales team among B2B cross-border trade payment platforms according to CIC. Our sales professionals work closely with customers to help them understand our products, navigate cross-border payment processes and integrate our platform into their daily trade operations. The effectiveness of our sales model is reflected in our strong customer growth and attractive unit economics. Our annual active customer base expanded from 82,614 as of December 31, 2023 to 148,952 as of December 31, 2025, while our industry leading payback period was 7.6 months in 2025, demonstrating the scalability and efficiency of our go-to-market strategy. Furthermore, our average TPV generated by experienced sales person increased from US\$22.0 million in 2023 to US\$35.9 million in 2024, and further to US\$56.0 million in 2025, demonstrating the increasing efficiency of our sales force.

We also collaborate with third-party channel partners for customer acquisition and marketing, including business associations, logistics service providers and enterprise service providers, which complement our direct sales efforts and further enhance our market reach. This global presence enables us to reach SMEs across diverse markets and industries and to support our ongoing international expansion. Benefiting from our strong customer engagement and service quality, we also generate substantial word-of-mouth referrals within the SME community, which serve as an important driver of customer acquisition. Through these referrals and our expanding ecosystem, interactions among buyers and sellers on our platform further reinforce our network effects and contribute to the continued growth of our customer base.

## CUSTOMERS AND SUPPLIERS

### Our Customers

Our customers primarily consist of SMEs engaged in cross-border trade. In 2023, 2024 and 2025, the total revenue generated from our five largest customers, primarily SMEs in Chinese Mainland, Hong Kong and various foreign jurisdictions who utilize our payment and value-added services in connection with cross-border trade, in each year during the Track Record Period amounted to US\$1.1 million, US\$0.7 million and US\$0.9 million, accounting for 0.9%, 0.4% and 0.3% of our total revenue, respectively. For the same periods, revenue generated from our largest customer amounted to US\$0.5 million, US\$0.2 million and US\$0.2 million, accounting for 0.4%, 0.1% and 0.1% of our total revenue, respectively. During the Track Record Period, we were not subject to any material customer concentration risk. During the Track Record Period and up to the Latest Practicable Date, to the knowledge of our Directors, none of our Directors, their close associates or any of our Shareholders (who or which to the knowledge of the Directors owned more than 5% of our issued share capital) had any interest in any of our five largest customers in each year during the Track Record Period.

We also generated revenue from interest income on client funds from financial institutions, which arose from client funds temporarily held in their collection accounts maintained at our platform pending pay-out and withdrawal or further instructions from customers. We opened dedicated client fund accounts at financial institutions recognized by relevant regulatory agencies to hold such funds, which generated interest income during the process. Based on our agreements with customers, the customers are not entitled to interest income generated from such accounts. According to CIC, such practice is a

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well-established industry norm. For details, see “— Agreements with Customers.” We do not consider these financial institutions as our customers. Operationally, a “customer” is a party that contracts to obtain goods or services that are outputs of our ordinary activities. Banks that pay interest on client balances do not obtain our services and therefore are not our customers. For details on interest income on client funds, see “Financial Information — Description of Major Components of Our Results of Operations — Revenue.”

### *Agreements with Customers*

The key terms of our standard form agreement for payment services with our customers are set out below:

- *Terms.* Our agreements with customers typically do not have a definitive term and can be suspended or terminated pursuant to the terms of the agreement.
- *Interest income on client funds.* Funds held in customers’ collection accounts will not accrue or be credited with interest. We are entitled to retain any interest generated in respect of funds collected or held by us on customers’ behalf.
- *Record and confidentiality.* We collect and store our customers’ personal as well as transaction data and information for provision of our services. We shall maintain records and protect personal information and confidential data in compliance with applicable laws and regulations.
- *Scope of liability.* To the fullest extent permitted by applicable laws, we shall not be liable for any indirect, special, incidental or consequential losses, including loss of profits, revenue, business or data. The total aggregate liability of us shall not exceed the total service fees paid by the customer in the 12 months prior to the occurrence of the relevant event. We shall not be liable for any losses arising from events beyond our reasonable control, including force majeure, system or network failures, cyberattacks, third-party risks or user misconduct. We do not exclude liability for fraud, fraudulent misrepresentation, death or personal injury caused by negligence, or any other liability that may not be lawfully excluded or limited.
- *Suspension and termination.* Our customers are entitled to terminate the services at any time upon completion of verification procedures. Upon termination, customers are required to cease use of our services and settle any outstanding obligations, and we will return any remaining customer funds in accordance with the applicable terms and conditions. We are entitled to suspend or terminate the customer’s collection account and related services at its discretion without prior notice if (i) the customer breaches the agreement, (ii) we have reason to believe the customer violates applicable laws and regulations, (iii) we are requested or directed to do so by competent authorities, or (iv) we reasonably determine that continued provision of services may expose us to legal, regulatory or financial risks, including in circumstances involving suspected fraud, money laundering, terrorist financing, unauthorized account use or other security concerns.

### *Customer Services*

We believe our superior customer service capabilities enhance service quality and strengthen customer loyalty and brand recognition. Our dedicated customer service team is committed to delivering high-quality and efficient support to customers worldwide through multiple channels, including our websites, emails, social media platforms and customer service hotlines. We have developed intelligent customer service agents to autonomously resolve real-world customer issues, which reduced human intervention and increase customer service productivity as measured by customer service resolution rate. We are able to provide timely responses in multiple languages across various communication channels. We

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are able to handle customer inquiries and complaints on a 24/7 basis. We promptly address customer feedback and coordinate with relevant departments to deliver effective and timely solutions. During the Track Record Period and up to the Latest Practicable Date, we had not received any material customer complaints.

### Our Suppliers

Our suppliers mainly include business travel service providers, leasing service providers, payment channel service providers and cloud server providers. In 2023, 2024 and 2025, the aggregate purchases from our top five suppliers in each year of the Track Record Period amounted to US\$5.9 million, US\$8.4 million and US\$11.7 million, accounting for 30.1%, 25.2% and 27.5% of our total purchase, respectively. For the same periods, purchases from our largest supplier amounted to US\$1.3 million, US\$2.5 million and US\$4.3 million, accounting for 6.8%, 7.4% and 10.2% of our total purchase, respectively.

### Year Ended December 31, 2023

Rank	Suppliers	Type of products/services purchased	Background	Year of commencement of business relationship	Purchase amount	% of our total purchase
					<i>USD'000</i>	
1 . . .	Supplier A	Business travel services	A private company primarily engaged in tech-enabled retail, which was established in Guangdong, with a registered share capital of RMB7,500 million.	2022	1,343	6.8
2 . . .	Supplier B	Cloud server and related resources	A subsidiary of a public company listed on the Stock Exchange and NYSE with a registered share capital of RMB1,010 million.	2020	1,186	6.0
3 . . .	Supplier C	Payment channel services	A private company primarily engaged in payment facilitation, which was established in Beijing, with a registered share capital of RMB300 million.	2020	1,175	5.9
4 . . .	Supplier D	Leasing services	A private company primarily engaged in commercial property leasing, which was established in Shanghai, with a registered share capital of RMB650 million.	2020	1,162	5.9
5 . . .	Supplier E	Leasing services	A private company primarily engaged in commercial property leasing, which was established in Shanghai, with a registered share capital of RMB800 million.	2021	1,083	5.5

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*Year Ended December 31, 2024*

<b>Rank</b>	<b>Suppliers</b>	<b>Type of products/services purchased</b>	<b>Background</b>	<b>Year of commencement of business relationship</b>	<b>Purchase amount</b>	<b>% of our total purchase</b>
					<i>USD'000</i>	
1 . . .	Supplier B	Cloud server and related resources	A subsidiary of a public company listed on the Stock Exchange and NYSE with a registered share capital of RMB1,010 million.	2020	2,468	7.4
2 . . .	Supplier A	Business travel services	A private company primarily engaged in tech-enabled retail, which was established in Guangdong, with a registered share capital of RMB7,500 million.	2022	2,003	6.0
3 . . .	Supplier C	Payment channel services	A private company primarily engaged in payment facilitation, which was established in Beijing, with a registered share capital of RMB300 million.	2020	1,818	5.5
4 . . .	Supplier E	Leasing services	A private company primarily engaged in commercial property leasing, which was established in Shanghai, with a registered share capital of RMB800 million.	2021	1,134	3.4
5 . . .	Supplier F	Payment channel services	A US-based multinational bank.	2022	950	2.9

*Year Ended December 31, 2025*

<b>Rank</b>	<b>Suppliers</b>	<b>Type of products/services purchased</b>	<b>Background</b>	<b>Year of commencement of business relationship</b>	<b>Purchase amount</b>	<b>% of our total purchase</b>
					<i>USD'000</i>	
1 . . .	Supplier B	Cloud server and related resources	A subsidiary of a public company listed on the Stock Exchange and NYSE with a registered share capital of RMB1,010 million.	2020	4,337	10.2

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Rank	Suppliers	Type of products/services purchased	Background	Year of commencement of business relationship	Purchase amount <i>USD'000</i>	% of our total purchase
2 . . .	Supplier G	Payment channel services	A subsidiary of a public company listed on the Shenzhen Stock Exchange, primarily engaged in payment facilitation, which was established in Guangdong in 2013, with a registered share capital of RMB100 million.	2024	2,525	5.9
3 . . .	Supplier H	Payment channel services	A private company engaged in payment facilitation, which was established in Canada.	2025	1,755	4.1
4 . . .	Supplier A	Business travel services	A private company primarily engaged in tech-enabled retail, which was established in Guangdong, with a registered share capital of RMB7,500 million.	2022	1,568	3.7
5 . . .	Supplier F	Payment channel services	A US-based multinational bank.	2022	1,545	3.6

During the Track Record Period, we have not experienced any significant fluctuation in prices set by our suppliers or material breach of contract on the part of our suppliers. As of the Latest Practicable Date, none of our Directors, their close associates or any of our Shareholders (who or which to the knowledge of the Directors owned more than 5% of our issued share capital) had any interest in any of our five largest suppliers.

### ***Supply Chain Management***

We have established a supplier management system covering the full lifecycle of our suppliers, including due diligence, ongoing evaluation and a blacklist mechanism for non-compliant suppliers. We also implement anti-corruption and business ethics measures, including integrity agreements with suppliers, clear communication of anti-bribery and fair trade requirements, and internal controls such as a gifts and gratuities policy, to promote a transparent, compliant and accountable supply chain.

## **INTELLECTUAL PROPERTY**

Intellectual property rights are critical to our business. Our intellectual properties cover a broad range of areas, including algorithm, model and patterns, risk forecast, process cycle and model algorithm. As of December 31, 2025, we applied for the registration of 24 patents to the Patent Office of China National Intellectual Property Administration, or the CNIPA; we applied for the registration of 253 trademarks, among which 155 have been registered with the Trademark Office of the CNIPA; and we registered 45 software copyrights with the Copyright Protection Center of the PRC. As of the same date, we applied for the registration of 237 trademarks overseas, among which 179 have been registered with the competent regulatory authorities of the relevant jurisdictions. We also intend to pursue additional

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intellectual property protections in markets where we operate, to the extent we believe it would be beneficial and cost-effective. See “Appendix IV — Statutory and General Information — Further Information about Our Business — Intellectual Property Rights” for details of our material intellectual property rights.

To maintain and protect our intellectual property, we have standardized the application, maintenance, and renewal processes for patents and trademarks. We are responsible for IP evaluation, ledger management, and fee renewals, and entrusts third-party agencies to handle application matters, ensuring the effective protection of our intellectual property. We intend to protect our technology and proprietary rights vigorously, but there can be no assurance that our efforts will be successful. During the Track Record Period and up to the Latest Practicable Date, we did not have any material disputes regarding intellectual property rights with third parties.

## COMPETITION

The global B2B cross-border trade payment platform industry is highly competitive and has become increasingly well established over the past decade. We compete primarily with other cross-border payment platforms and, to a lesser extent, with traditional financial institutions. We believe that competition in this market is primarily driven by the breadth and depth of settlement network coverage, the strength of risk management infrastructure, technological capabilities, sales efficiency, industry know-how, service quality and brand recognition. In particular, the ability to establish global and local settlement network, robust risk control infrastructure, leading technology capabilities, broad customers and financial institutions ecosystem as well as effective customer acquisition and service capabilities represent significant entry barriers. Platforms lacking these capabilities may face difficulties in establishing compliant cross-border trade payment business, achieving operational efficiency and delivering a reliable customer experience at scale. According to CIC, we ranked as the world’s largest B2B cross-border trade payment platform with over US\$60 billion TPV and a market share of 5.1% in 2025. We believe our market position reflects the strength of our settlement network, risk management infrastructure and technology capabilities.

## EMPLOYEES

As of December 31, 2025, we had 3,122 full-time employees. As of the same date, the vast majority of our employees were based in China. The following table sets forth a breakdown of our full-time employees by function as of December 31, 2025.

<u>Function</u>	<u>Number</u>	<u>% of Total</u>
Sales and marketing . . . . .	2,247	72.0
General and administration . . . . .	523	16.7
Research and development . . . . .	352	11.3
<b>Total</b> . . . . .	<b>3,122</b>	<b>100.0</b>

Our success depends on our ability to attract, motivate, train and retain qualified personnel. We adopt high standards in recruitment with strict procedures to ensure the quality of new hires. We adopt various channels for our recruitment, including campus recruitment, online recruitment, internal recommendation and recruitment through headhunter firms or agents, to satisfy our demand for different types of talents. We believe we offer our employees competitive compensation packages and an environment that encourages self-development and creativity. We provide training programs for our employees in order to enhance their professional and technical skills and understanding of our industry. We design and offer various training programs for employees at different positions and departments based on their diverse needs. As a result, we have generally been able to attract and retain qualified personnel. We believe that we maintain a good working relationship with our employees, and we have not experienced any work stoppages due to labor disputes in the past. None of our employees are represented by labor unions.

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Under applicable laws, we participate in various government statutory employee benefit plans, including social insurance funds, namely, medical insurance, maternity insurance, workplace injury insurance, unemployment insurance, and pension benefits, as well as a housing provident fund. We are required under applicable laws to contribute to employee benefit plans at specified percentages of the salaries, bonuses, and certain allowances of our employees up to a maximum amount specified by the local government from time to time. Bonuses are generally discretionary and based in part on employee performance and in part on the overall performance of our business. We have granted, and plan to continue to grant share-based incentive awards to our employees in the future to incentivize their contributions to our growth and development.

We enter into standard labor contracts with our employees. We also enter into standard confidentiality agreements with all of our employees and non-compete agreements with our key employees. During the Track Record Period and up to the Latest Practicable Date, we did not experience any material strikes, protests or other labor conflict or dispute.

## PROPERTIES

As of the Latest Practicable Date, we did not own any properties. As of the Latest Practicable Date, we leased 36 properties in China, primarily used as offices, with a gross floor area of approximately 29,283.9 sq.m, and 15 properties overseas, primarily used as offices.

As of the Latest Practicable Date, the lease agreements in respect of 20 of our leased properties had not been duly registered with the relevant government authorities in accordance with PRC laws, with a gross floor area of approximately 10,587.8 sq.m. As advised by our PRC Legal Advisor, the failure to register lease agreements does not affect their legality, validity or enforceability, and such defects have not affected and will not affect our actual use of such properties.

All of the above property interest form part of our non-property activities. As of December 31, 2025, we had no single property with a carrying amount of 15% or more of our total assets, and on this basis, we are not required by Rule 5.01A of the Listing Rules to include in this Document any valuation report. Pursuant to section 6(2) of the Companies (Exemption of Companies and Prospectuses from Compliance with Provisions) Notice (Chapter 32L of the Laws of Hong Kong), this Document is exempted from compliance with the requirements of section 342(1)(b) of the Companies (Winding Up and Miscellaneous Provisions) Ordinance in relation to paragraph 34(2) of the Third Schedule to the Companies (Winding Up and Miscellaneous Provisions) Ordinance, which requires a valuation report with respect to all of our interests in land or buildings.

## INSURANCE

We have obtained insurance to cover certain potential risks and liabilities, such as property damage insurance, directors’ and officers’ insurance, employer liability insurance, public liabilities for business premises, among others. During the Track Record Period, we did not make any material insurance claims in relation to our business. Our employee-related insurance consists of pension insurance, maternity insurance, unemployment insurance, work-related injury insurance, medical insurance and housing funds, as required by PRC laws and regulations.

We consider our insurance coverage to be adequate as we have in place all the mandatory insurance policies required by PRC laws and regulations and in accordance with the commercial practices in our industry. However, our insurance policies are subject to standard deductibles, exclusions and limitations. As a result, our insurance policies may not be able to cover all of our losses and we cannot provide any assurance that we will not incur losses or suffer claims beyond the limits of, or outside the relevant coverage of, our insurance policies. See “Risk Factors — Risks Relating to our Business and Industry — We may not have sufficient insurance coverage to cover our business risks.”

## BUSINESS

### ENVIRONMENTAL, SOCIAL AND GOVERNANCE

#### Overview

We recognize that Environmental, Social and Governance (“ESG”) matters are fundamental to achieving long-term corporate value and high-quality development. We are committed to embedding ESG principles throughout our strategic development and business operations. By continuously optimizing our governance framework, we aim to create sustainable value for our diverse stakeholders, including employees, customers, suppliers, and partners — while actively fulfilling our corporate social responsibilities.

#### ESG Governance

We recognize the fundamental value of Board diversity in enhancing corporate governance and the scientific nature of decision-making, and have established and implemented a Board Diversity Policy. In appointing Board members, we focus not only on our business model and specific development needs, but also comprehensively evaluate a diverse range of factors, including the candidates’ skills, professional experience, educational background, knowledge, expertise, cultural background, independence, age, and gender.

To ensure the close integration of our ESG strategy with our overall business strategy, we have established a clearly defined, top-down three-tier sustainable development governance structure comprising the “Board of Directors — ESG Management Group — Business and Functional Departments.” The Board, as the highest decision-making body, assumes ultimate responsibility for ESG matters, including reviewing overall strategies and approving targets relative to material ESG issues. The ESG Management Group, chaired by our Chief Financial Officer and composed of senior and mid-level management from relevant functions, is responsible for formulating ESG objectives, reviewing implementation plans and coordinating resources to translate strategy into action, while business and functional departments are responsible for execution and maintaining a routine information feedback mechanism. We also link executive compensation to key ESG performance indicators, incorporating core metrics such as compliance, information security and data privacy into our appraisal system to promote effective ESG management.

#### ESG Risk Management

We continuously optimize our internal risk control management policy and have established a comprehensive ESG risk management framework. By integrating ESG principles into our core strategy and governance structure, we have enhanced the company’s risk resilience and management capabilities.

We have analyzed the potential impacts that ESG-related risks may have on our business:

Risk Type	Potential Impact	Mitigating Measures
Energy and Resource Consumption Risk	As our business continues to expand and our headcount increases, the consumption of energy and water at facilities and office premises may increase accordingly, which may lead to higher operating costs.	Promote the transformation of green operations, optimize energy and water resource management in office premises, and adopt energy-saving equipment and intelligent control systems to reduce energy consumption. Establish a statistical and monitoring mechanism for resource consumption, set energy consumption control targets in line with the pace of business expansion, balance business development and resource conservation, and mitigate the risk of rising operating costs.

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Risk Type	Potential Impact	Mitigating Measures
Business Continuity Risk	With the continuous expansion of our business scale, we are highly dependent on the stable operation of our digital platforms and cross-border payment infrastructure. Any force majeure events (such as extreme weather or public health emergencies) or technical failures may lead to temporary interruptions of core services such as cross-border fund settlements, which in turn could affect the cash conversion efficiency of our customers (especially SMEs) and their brand trust in our platform. Additionally, the execution of business recovery and contingency plans may incur extra operating costs, potentially impacting our financial performance.	Establish a multi-dimensional business continuity safeguard system, optimize the redundant backup mechanism of digital platforms and global payment infrastructure, formulate and regularly conduct drills for emergency response plans against force majeure and technical failures. Strengthen collaboration with core service providers, enhance the rapid recovery capability in the event of core service interruptions, and minimize potential impacts on customers and the company’s finance.
Information Security and Privacy Risk	Inadequate information security and privacy protection could lead to significant risks and impacts, including data breaches, cyberattacks, and information system failures or paralysis, thereby undermining customer trust and damaging brand reputation. Furthermore, financial losses may occur due to service abnormalities, customer churn, and increased compliance costs.	Build a comprehensive information security and data privacy protection system, continuously increase investment in security technologies, and regularly conduct vulnerability detection and attack-defense drills. Strictly comply with data compliance requirements, improve the hierarchical protection mechanism for customer information, and strengthen employee information security training to prevent data leakage and system risks, and safeguard customer trust and brand reputation.

### Environment

#### *Environmental Management*

Our daily business operations do not involve any production or manufacturing processes; therefore, our impact on the environment in terms of air and greenhouse gas (“GHG”) emissions, discharges into water and land, and the generation of hazardous or non-hazardous waste is limited. Notwithstanding this limited impact, we continue to take measures to reduce resource consumption and carbon emissions to enhance our overall environmental performance. We strictly comply with national and local environmental laws and regulations and integrate sustainability concepts into our daily operations.

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### *Emissions Management*

We have established and implemented a standardized waste disposal mechanism. Meanwhile, we actively respond to national waste classification policies by placing sorted waste bins in office areas and conducting promotional guidance to encourage employees to participate in waste classification, thereby improving resource recovery and utilization levels. The table below sets forth the quantitative data regarding our emissions for the years indicated:

		For the year ended December 31,		
		2023	2024	2025
<b>Indicators</b>	<b>Unit</b>			
Hazardous waste emissions . . .	<i>Tonnes</i>	0.02	0.02	0.03
Hazardous waste emission intensity . . . . .	<i>kg/US\$ million revenue</i>	0.14	0.13	0.11
Non-hazardous waste emissions . . . . .	<i>Tonnes</i>	202	232	256
Non-hazardous waste emission intensity . . . . .	<i>kg/US\$ million revenue</i>	1,760.24	1,431.22	1,030.35

### *Resources Consumption Management*

We actively promote the concept of a circular economy, adhering to the principles of “priority on conservation”, “low-carbon emission reduction” and “reduction at source”. The table below sets forth the quantitative data regarding our energy and natural resource consumption for the years indicated:

		For the year ended December 31,		
		2023	2024	2025
<b>Indicators</b>	<b>Unit</b>			
Electricity consumption . . . . .	<i>MWh</i>	1,369.11	1,543.47	1,859.90
Electricity consumption intensity . . . . .	<i>kWh/US\$ million revenue</i>	11.93	9.52	7.49
Water consumption . . . . .	<i>m<sup>3</sup></i>	2,467	2,363	1,915
Water consumption intensity . . . . .	<i>m<sup>3</sup>/US\$ million revenue</i>	21.50	14.58	7.71

### *Climate Change*

In view of the potential impact of climate change on our financial performance and sustainable development, we systematically identify the risks and opportunities arising from climate change through policy research and business analysis. We formulate corresponding strategies to effectively manage risks while capturing developmental opportunities, actively taking measures to enhance our climate resilience.

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Impact Category		Mitigating Measures
<b>Physical Risks</b>	<p>Climate change may increase the frequency and severity of extreme weather events (such as rainstorms, floods, and typhoons). Such events may damage data centers, equipment, offices, and IT infrastructure, leading to data loss, business interruption, property damage, or personal injury, resulting in economic losses.</p>	<p>During the site selection stage, we avoid leasing data centers in areas prone to frequent extreme weather events.</p> <p>During the operational stage, we formulate emergency response plans for extreme weather to ensure business continuity.</p> <p>We regularly conduct natural disaster prevention awareness campaigns for employees to strengthen their safety awareness.</p>
<b>Transition Risks</b>	<p><i>Legal and Policy Risks</i></p> <p>Governments and regulatory agencies are becoming increasingly stringent regarding climate change supervision. Relevant policies and disclosure requirements are continuously updated. Failure to identify and comply with these requirements may lead to administrative penalties and increased operating costs.</p> <p><i>Technology Risks</i></p> <p>To meet low-carbon operation goals, some legacy IT infrastructure or office equipment may face risks of early retirement or impairment. Migrating to more environmentally friendly, high-efficiency equipment requires higher capital investment.</p> <p><i>Market Risks</i></p> <p>As customers pay increasing attention to climate change, low-carbon, and environmental topics, failure to meet stakeholders’ ESG requirements may weaken our market competitiveness and pressure business expansion.</p>	<p>We continuously monitor laws, regulations, and regulatory requirements in fields such as climate change, energy conservation, and environmental protection and analyze the potential impact of policy changes based on our business characteristics and formulate corresponding response strategies and measures.</p> <p>We mitigate the financial impact of phasing out legacy equipment through reasonable asset disposal methods.</p> <p>We actively respond to low-carbon development trends by systematically promoting emission reduction actions, optimizing server energy efficiency, and rationally deploying computing resources.</p>
<b>Opportunities</b>	<p>Continued deepening of digital office and online service models can significantly reduce paper usage and business travel, lowering administrative expenses.</p>	<p>We promote electronic documents and online signing, reduce paper-based processes, and encourage video conferencing over non-essential cross-border business travel to reduce operating costs.</p>

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### Greenhouse Gas Emissions Management

We continuously calculate and monitor the GHG emissions generated by our operations. From 2023 to 2025, we had no Scope 1 GHG emissions. Our emissions primarily cover Scope 2 and key Scope 3 categories, providing fundamental data to support the formulation of scientific emission reduction targets and the promotion of low-carbon operations. The table below sets forth the quantitative data regarding our GHG emissions for the years indicated:

		For the year ended December 31,		
		2023	2024	2025
<b>Indicators</b>	<b>Unit</b>			
Scope 1 GHG emissions . . . . .	<i>tCO<sub>2</sub>e</i>	–	–	–
Scope 2 GHG emissions . . . . .	<i>tCO<sub>2</sub>e</i>	732.54	823.49	993.53
Total GHG emissions (Scope 1 & 2) . . . . .	<i>tCO<sub>2</sub>e</i>	732.54	823.49	993.53
Scope 1 & 2 GHG emission intensity . . . . .	<i>tCO<sub>2</sub>e/US\$ million revenue</i>	6.38	5.08	4.00
Scope 3 GHG emissions . . . . .	<i>tCO<sub>2</sub>e</i>	2,949.80	7,068.41	8,637.25

*Note:*

- (1) Our GHG emissions mainly include Scope 2 emissions from purchased electricity and purchased steam. Scope 3 GHG emissions include Category 1 (Purchased Goods and Services), Category 2 (Capital Goods), Category 5 (Waste Generated in Operations) and Category 6 (Business Travel). The calculation methodology for GHG emissions refers to the “A Corporate Accounting and Reporting Standard (GHG Protocol),” the “Corporate Value Chain (Scope 3) Accounting and Reporting Standard (GHG Protocol)” and the “Sixth Assessment Report” of the IPCC. Emission factors and parameters refer to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories, the “Announcement on the Release of 2022 Electricity CO<sub>2</sub> Emission Factors” by the Ministry of Ecology and Environment, the Chinese Life Cycle Greenhouse Gas Emission Factor Database, the HKEX “How to Prepare an ESG Report Appendix 2: Reporting Guidance on Environmental KPIs,” the Singapore EMA 2024 Grid Emission Factors, the Netherlands CBS 2024 Grid Emission Factors and other domestic and international greenhouse gas emission factor databases.

### Greenhouse gas reduction targets and progress

We are in the process of setting science-based GHG emission reduction targets and continuously enhancing our carbon emissions management across our operations. We will disclose our progress and phased commitments in a timely manner. We are committed to reducing our Scope 1 and Scope 2 GHG emission intensity by 15% by 2030, compared to our 2025 baseline, as part of our ongoing efforts to manage and mitigate carbon emissions across our operations.

## Social Responsibility

### Employment

We strictly abide by the relevant laws and regulations regarding employment in the jurisdictions where we operate, as well as the core conventions of the International Labour Organization (ILO). We resolutely prohibit child labor and forced labor and have established a comprehensive labor management system. We prevent child and forced labor through measures such as identity verification during recruitment, regular audits of employee information, and standardized overtime approval processes. If any violation is discovered, employment is terminated immediately and remedial actions are taken. Regarding written labor contracts, we clearly stipulate essential terms including contract duration, remuneration, working hours, and social insurance, achieving a 100% labor contract signing rate. In terms of recruitment, we adhere to the principles of standardization and fairness. We actively promote workplace diversity and advocate for equal opportunities and fair treatment regardless of background, age, or gender. We provide employees with clear, fair, and guaranteed remuneration and have established a transparent compensation structure. We are committed to fostering a fair, inclusive, and mutually supportive work environment.

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## BUSINESS

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### *Health and Safety*

We attach great importance to the occupational health and safety of our employees and are committed to creating a safe, healthy, and comfortable office environment. As our business does not involve production facilities, major health and safety risks are relatively low. We strictly follow core laws and regulations regarding workplace safety and the prevention of occupational diseases. We clarify safety requirements for office electricity, fire safety, environmental access, and equipment operation to prevent safety hazards and ensure occupational health.

### *Development and Training*

To support sustainable business development, we systematically organize induction and on-the-job training based on job requirements and business strategies, helping employees continuously improve their performance in technical capabilities, project management, and compliant operations. We abide by internal policies such as the Promotion Management System and Performance Management System to build clear career development paths for our employees.

### *Information Security and Privacy Protection*

To strengthen customer information security and privacy protection, we strictly comply with relevant laws and regulations and have formulated internal specifications such as the Information Security Management System and Data Security Management Measures, while explicitly defining security responsibilities within employee disciplinary codes. At the technical level, we implement data encryption, access control, log auditing, network isolation, and terminal management, and have introduced a zero-trust architecture alongside regular vulnerability scanning and penetration testing. We conduct information security assessments on third-party partners and enter into confidentiality agreements with them, providing customers with convenient channels to exercise their data rights. All employees have signed confidentiality agreements, with those in sensitive positions signing additional specialized commitment letters. We regularly conduct information security training and emergency drills, and continuously strengthen supervision through internal audits. We enforce accountability for non-compliance, constructing a customer information protection system covering “people, systems, technology, and processes.”

### *Business Ethics and Anti-Corruption*

We maintain a “zero tolerance” policy toward bribery and corruption. We have established and enforced anti-bribery, anti-corruption and whistleblowing policies, which prohibit improper benefits and provide multiple reporting channels with confidentiality and whistleblower protection. We conduct regular monitoring through internal audits and control procedures, and the Inspection Department is responsible for investigating reported matters. We also require integrity agreements with key partners and employees in sensitive positions, and provide regular training to promote ethical conduct. During the reporting period, we were not involved in any concluded legal cases regarding corruption.

### *Community Contribution*

We actively participate in public welfare and charitable undertakings, striving to achieve a positive interaction between corporate growth and community development. Since 2024, we have organized and participated in several public welfare activities, including educational assistance in mountainous areas, support for rural women’s entrepreneurship and the inheritance of intangible cultural heritage, as well as old clothing recycling and winter clothing donations. Total employee participation exceeded 500 person-times, with donated materials and funds exceeding RMB100,000. We supported the construction of community trails in Yangpu District, Shanghai, through charity runs, benefiting over a thousand residents. We also conducted educational assistance in the mountainous areas of Guangxi, donating materials and providing public welfare courses to nearly 500 teachers and students, taking practical actions to contribute to rural revitalization and community co-construction. We continue to leverage our professional advantages and talent resources to transform corporate capabilities into sustainable social value.

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### LICENSES, PERMITS AND CERTIFICATES

We are required by relevant laws and regulations to obtain and maintain various licenses and permits or collaborate with licensed institutions in order to operate our business in the PRC and globally. As of March 31, 2026, we had built a license portfolio of 36 required licenses and relevant qualifications that cover material markets including Chinese Mainland, Hong Kong, the U.K., the U.S., Singapore, Netherlands (allowing us to provide electronic money and payment services across all 30 EEA countries under passporting), Australia and Canada. For emerging markets, we cover through partnership with qualified institutions in emerging markets, such as Africa and Latin America. The following table sets out our required licenses and relevant qualifications.

License/Permit	Entity	Country/Region	Expiration date	Issuing Authority
Payment Business Permit (支付業務許可證) . . . . .	Shanghai Anxinhui	Chinese Mainland	August 28, 2026 <sup>(1)</sup>	The People’s Bank of China
Notice of Filing for Cross-border Renminbi Business Conducted in Cooperation with Payment Institutions (銀行與支付機構合作開 展跨境人民幣業務備案 通知書) . . . . .	Shanghai Anxinhui	Chinese Mainland	/	The People’s Bank of China, Shenzhen Branch
Money Service Operators .	XTransfer Limited	Hong Kong	October 24, 2027	Hong Kong Customs and Excise Department
SFC license (Type 1, 4, 9) . . . . .	XTransfer Financial Services (HK) Limited	Hong Kong	/	The Securities and Futures Commission of Hong Kong
Authorised Payment Institution . . . . .	XTransfer UK Limited	United Kingdom	/	The Financial Conduct Authority
Money Transmitter License . . . . .	XTransfer Inc.	The United States <sup>(2)</sup>	/	Financial Crimes Enforcement Network and various state agencies
Money Services Business . . . . .	XTransfer Inc.	The United States	January 4, 2028	Financial Crimes Enforcement Network
Major Payment Institutions . . . . .	XTransfer Pte. Ltd.	Singapore	/	Monetary Authority of Singapore
Electronic Money Institutions . . . . .	XTransfer B.V.	Authorized in Netherlands, allowing us to provide electronic money and payment services across all 30 EEA countries under passporting	/	De Nederlandsche Bank (the central bank for the Netherlands)

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<u>License/Permit</u>	<u>Entity</u>	<u>Country/Region</u>	<u>Expiration date</u>	<u>Issuing Authority</u>
Independent Remittance Dealer . . . . .	XTransfer AU Pty Ltd.	Australia	/	Australian Transaction Reports and Analysis Centre
Money Service Business . . . . .	XTransfer CA Limited	Canada	October 25, 2027	Financial Transactions and Reports Analysis Centre of Canada

*Notes:*

- (1) We are in the process of renewing this license, and we do not foresee any material legal impediments to such renewal.
- (2) Including the States of Florida, Delaware, Colorado, the District of Columbia, Utah, New Hampshire, Georgia, Arizona, Idaho, New Mexico, Iowa, Illinois, South Carolina, Michigan, Arkansas, Kansas, Alaska, Oregon, Maine, West Virginia, Oklahoma, Alabama, North Dakota, Wyoming, Mississippi and Rhode Island.

During the Track Record Period and up to the Latest Practicable Date, we had obtained all requisite licenses and permits that are material to our operations from the relevant regulatory authorities in the jurisdiction in which we operate. We renew all such material permits and licenses from time to time to comply in all material aspects with the relevant laws and regulations and we do not expect any material difficulties in such renewals so long as we comply with the applicable requirements and conditions set by the relevant laws and regulations.

**LEGAL PROCEEDINGS AND COMPLIANCE**

During the Track Record Period and up to the Latest Practicable Date, we had not been a party to, and were not aware of any threat of, any legal, arbitral or administrative proceeding which, in our opinion, would likely have a material and adverse effect on our business, financial condition or results of operations. During the Track Record Period and up to the Latest Practicable Date, we, to our best knowledge, were not subject to any investigations by regulatory authorities in the PRC and other jurisdictions.

During the Track Record Period and up to the Latest Practicable Date, we had not been and were not involved in any material non-compliance incidents that have led to fines, enforcement actions or other penalties that could, individually or in the aggregate, have a material adverse effect on our business, financial condition and results of operations.

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### AWARDS AND RECOGNITIONS

The table below sets forth an indicative list of some of the awards and recognitions we had received as of the Latest Practicable Date.

Year	Award/Recognition	Awarding Authority
2025 . . . . .	World Artificial Intelligence Conference: Recommended AI Solutions for SME	China Association of Small and Medium Enterprises
2025 . . . . .	2025 Awards for Excellence: Best In-house Use of AI in Fraud and Financial Crime Detection	Regulation Asia
2025 . . . . .	Outstanding “AI+” Application Case in Shanghai Commercial Sector	Shanghai E-Commerce and Consumption Promotion Center (United Nations Trade Network Shanghai Center)
2025 . . . . .	The Asset Triple A Awards: Best Payments and Collections Solution	The Asset
2025 . . . . .	Cross-Border Payments 100	FXC Intelligence
2024 . . . . .	The Asset Triple A Awards: Best Cash Management Solution	The Asset
2024 . . . . .	Top 30 Leading Globalization Brands	Forbes China
2024 . . . . .	Best Payment Solutions Provider	Corporate Treasurer
2024 . . . . .	Global Digital Trade Industry Top 100 Enterprises	Forbes China, Hangzhou Municipal Government
2023 . . . . .	Top 50 Intelligent Risk Control Enterprises	Internet Weekly
2022 . . . . .	China Technology Power Annual List	InfoQ
2022 . . . . .	Best Foreign Exchange Risk Management Solution	The Asset

### INTERNAL CONTROL

We have devoted ourselves to establishing and maintaining risk management and internal control systems consisting of policies and procedures that we consider to be appropriate for our business operations, and we are dedicated to continuously improving these systems.

#### Financial Reporting Risk Management

We have established a set of accounting policies in connection with our financial reporting risk management, which covers budget management, treasury management, financial statements preparation and staff management. We have procedures and IT systems in place to facilitate the implementation of our accounting policies and review of our management accounts. We also provide regular training to our finance department employees to ensure that they are kept up-to-date with our financial management and accounting policies.

#### Legal and Compliance Risk Management

We have established a robust framework for compliance risk management, involving our Board of Directors, senior management, and legal and compliance departments, along with various other departments. This system facilitates the creation of comprehensive policies and processes for managing compliance, ensuring continued conformity to all relevant laws and regulations. We have dedicated legal and compliance departments tasked with keeping abreast of updates to laws, regulations and policies. Our legal and compliance departments promptly identify any significant implications these changes may have on our business operations, and adjust our policies, procedures and compliance standards accordingly. Moreover, they implement a range of compliance and risk management activities, including reviewing and

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approving new products or services, playing a role in key risk decision-making, assisting and overseeing how well each department fulfills their compliance duties, and evaluating performance. Such measures ensure that our legal and compliance risks are kept within an acceptable limit.

### **Partner Financial Institutions Risk Management**

We have established comprehensive systems and policies to manage risks in collaboration with our partner financial institutions. Prior to onboarding, relevant teams, including compliance, client funds, finance, legal and product, conduct due diligence to assess key factors such as regulatory compliance, creditworthiness, reputation, liquidity and system capabilities to ensure that partners meet our onboarding standards. Following onboarding, we adopt a cross-functional approach to continuously monitor our partner financial institutions, including their compliance status, credit risk and public information, and take appropriate measures where necessary, such as managing exposure levels and transaction volumes, to ensure that risks remain within our risk appetite. We have also established a partner exit mechanism, under which we may suspend or terminate cooperation with partners whose risk profile deteriorates or exceeds our risk tolerance.

### **Internal Control**

To ensure strict compliance of our business operations with applicable rules and regulations, we have designed and adopted a set of comprehensive internal control policies. The implementation of such policies is overseen by our internal control team, which is also responsible for (i) performing group-level risk assessments, (ii) providing advice on risk management practice and (iii) establishing authorization and approval protocols. The effectiveness of the implementation of these internal control policies is independently reviewed and supervised by our internal audit team, which serves as the third line of defense.