FAVORABLE POLICIES RELATING TO NEVS IN CHINA

Exemption of Vehicle and Vessel Tax

According to the Notice of Preferential Vehicle and Vessel Tax Policies for Energy-saving and New-energy Vehicles and Vessels (《關於節能、新能源車船享受車船稅優惠政策的通知》) jointly promulgated by the Ministry of Finance (hereinafter referred to as the "**MOF**"), the Ministry of Transport, the State Taxation Administration (hereinafter referred to as the "**STA**"), and the Ministry of Industry and Information Technology (hereinafter referred to as the "**MIIT**") on July 10, 2018 and effective from the same date, purely electric commercial vehicles, plug-in (including extended-range) hybrid vehicles, and fuel cell commercial vehicles are exempt from vehicle and vessel tax, whereas purely electric passenger vehicle and fuel cell passenger vehicles are exempt from vehicle and vessel tax. The Catalogue of NEV Models Enjoying Vehicle and Vessel Tax Reduction and Exemption (《享受車船稅減免優惠的節約能源使用新能源汽車車型目錄》) jointly promulgated by the MIIT and the STA from time to time lists the NEV models eligible for enjoying vehicle and vessel tax reduction and exemption.

Exemption from Vehicle Purchase Tax

According to the Announcement on the Exemption of Vehicle Purchase Tax on NEV (《關於免徵新能源汽車車輛購置稅的公告》) jointly promulgated by the MOF, the STA, the MIIT, and the Ministry of Science and Technology on December 26, 2017 and implemented on January 1, 2018, the Announcement on the Relevant Policies on the Exemption of Vehicle Purchase Tax for NEV (《關於新能源汽車免徵車輛購置稅有關政策的公告》) jointly promulgated by the MOF, the STA, the MIIT, and the Ministry of Science and Technology on April 16, 2020 and came into effect on January 1, 2021, the Announcement on the Exemption of Vehicle Purchase Tax on New Energy Vehicles (《關於延續新能源汽車免徵車輛購置稅政策的公告》) jointly promulgated by the MOF, the STA and the MIIT on September 18, 2022 and came into effect on the same date, from January 1, 2018 to December 31, 2023, the purchase of NEV in the Catalogue of NEV Exempted from Vehicle Purchase Tax (《免徵車輛購置稅的新能源汽車車型目錄》) was exempted from vehicle purchase tax.

According to the Announcement on Continuing and Optimizing the Vehicle Purchase Tax Reduction and Exemption Policy for New Energy Vehicles (《關於延續和優化新能源汽車車輛購置稅減免政策的公告》) jointly promulgated by the MOF, the STA and the MIIT on June 19, 2023 and came into effect on the same date, the purchase tax exemption period for purchase of new energy vehicles was further extended to December 31, 2025; vehicle purchase tax for new energy vehicles with purchase dates from January 1, 2026 to December 31, 2027 is reduced by half.

Policies Relating to Incentives for NEV Charging Infrastructure

According to the Guiding Opinions on Accelerating the Promotion and Application of NEVs (《關於加快新能源汽車推廣應用的指導意見》) promulgated by the General Office of the State Council and effective on July 14, 2014, the PRC government has actively promoted the construction of charging infrastructure and requires local governments to actively build urban public charging facilities and appropriately simplify relevant planning and construction approval, improve the policies on fiscal prices, and gradually standardize the charging services pricing mechanism.

According to the Development Plan for the New Energy Vehicle Industry (2021–2035) (《新能源汽車產業發展規劃(2021–2035年)》) promulgated by the General Office of State Council on October 20, 2020, China will accelerate construction of charging infrastructure, improve the level of charging infrastructure services, and encourage business model innovation.

Pursuant to the Notice on the Issuance of Financial Support to Facilitate Efforts in Reaching Peak Carbon Dioxide Emissions and Carbon Neutralization (《關於印發財政支持做好碳達峰碳中和工作的意見的通知》) issued by the MOF on May 25, 2022, it proposes to vigorously support the development of new energy vehicles and improve the supporting policies for charging and replacement infrastructure.

According to the Notice on Strengthening and Expanding the Implementation of the Large-Scale Equipment Replacement and Consumer Goods Replacement in 2025 (《關於2025年加力擴圍實施大規模設備更新和消費品以舊換新政策的通知》) promulgated by the NDRC and the MOF on January 5, 2025, the Notice on Implementing the Retirement and Renewal of Obsolete Commercial Trucks (《關於實施老舊營運貨車報廢更新的通知》) issued by the Ministry of Transport, the NDRC, and the MOF on March 12, 2025, and the Notice on Implementing the Retirement and Renewal of Old Commercial Trucks (《關於實施舊營運貨車報廢更新的通知》) issued by the Ministry of Transport and the MOF on July 30, 2024, the subsidy scope for the retirement and renewal of obsolete commercial trucks has been expanded to include commercial trucks meeting the "National IV" emission standard and below. Retirement of old commercial trucks and purchase of new energy trucks qualify for both the subsidy for early retirement of obsolete commercial trucks and the subsidy for purchasing new energy commercial trucks.

REGULATIONS RELATING TO AUTOMOBILE SALES AND PROTECTION OF CONSUMER RIGHTS AND INTERESTS

According to the Measures for the Administration of Automobile Sales (《汽車銷售管理辦法》) promulgated by MOFCOM on April 5, 2017 and effective from July 1, 2017, local competent commerce departments at or above the county level shall supervise and manage the automobile sales and related activities of providing relevant services within their respective administrative regions. Automobile suppliers and dealers shall file the basic information through the National Automobile Circulation Information Management System of the competent commerce department of the State Council within 90 days from the date of obtaining their business licenses; and such automobile suppliers and dealers must update any change to their filed information within 30 days upon such change in information. Automobile suppliers and dealers shall sell automobiles, accessories, and other related products that comply with the relevant national provisions and standards. A dealer shall, at its business premise, expressly indicate the prices of the products to be sold and the standards for various service fees, and shall not sell any product at increased price or collect any additional fee. A dealer shall expressly indicate the product quality assurance, warranty services, and other after-sales service policies that consumers need to know.

According to the Law of the PRC on the Protection of Consumer Rights and Interests (《中華人民共和國消費者權益保護法》) promulgated by the Standing Committee of the National People's Congress (the "**SCNPC**") on October 31, 1993, last amended on October 25, 2013, and effective on March 15, 2014, business operators shall guarantee that their provided commodities or services meet the requirements on personal and property safety. For commodities and services which may endanger personal or property safety, business operators shall provide consumers with true explanations and clear warnings, explaining and indicating the correct methods of using commodities or receiving services and the methods for preventing damage. After discovering any defects which may endanger personal or property safety in their provided commodities or services, business operators shall immediately report to the relevant administrative departments and inform consumers; and take measures such as cessation of sale, issuance of a warning, recall, harmless treatment, destruction, and cessation of production or service. Business operators who fail to comply with consumer protection regulations are subject to civil or criminal liability in accordance with law.

Policies Relating to ESG

According to the Law of the People's Republic of China on Prevention and Control of Atmospheric Pollution (《中華人民共和國大氣污染防治法》) promulgated by the SCNPC on October 26, 2018, China adopts fiscal, tax and government procurement measures etc to promote energy-saving and environmental-friendly and new energy motor vehicles and vessels, non-road mobile machinery, restrict development of high fuel consumption, high emission motor vehicles and vessels and non-road mobile machinery, and reduce consumption of fossil energy. Motor vehicles and vessels as well as non-road mobile machinery shall not emit atmospheric pollutants beyond the standards. Manufacturing, importation or sale of motor vehicles and vessels and non-road mobile machinery which emit atmospheric pollutants beyond the standards shall be prohibited.

According to the State Council's Opinions on Accelerating the Development of the Energy Conservation and Environmental Protection Industry (《國務院關於加快發展節能環保產業的意見》) promulgated by the General Office of State Council on August 1, 2013, China is accelerating technological breakthroughs in and demonstration promotion of new energy vehicles. Efforts are being made to expedite the implementation of the technological innovation project for energy-efficient and new energy vehicles, significantly enhance innovation in power battery technology, with a focus on addressing issues related to the safety, reliability, and lightweight design of power battery systems. Additionally, research, development, and industrialization of key components such as drive motors, core materials, and electronic control systems are being strengthened. Supporting industries and charging infrastructure are being rapidly improved, while demonstration and promotion of pure electric vehicles, plug-in hybrid electric vehicles, air-powered vehicles, and others are being accelerated.

According to the Action Plan for Continuous Improvement of Air Quality (《空氣質量持續改善行動計劃》) promulgated by the State Council on November 30, 2023, China will accelerate the adoption of clean energy vehicles. Shanxi Province, Inner Mongolia Autonomous Region and Shaanxi Province will be designated as pilot zones for clean transportation, fostering a batch of clean transport enterprises. New energy medium- and heavy-duty trucks will be promoted in industries such as thermal power generation, steel, coal, coking, nonferrous metals and cement, as well as in logistics parks, to develop zero-emission freight fleets. By 2025, the coverage of fast-charging stations in highway service areas in key regions will reach no less than 80%, and no less than 60% in other regions.

According to the Guidance on Promoting the Integration of Transportation and Energy Development promulgated by the Ministry of Transport and nine other departments (《交通運輸部等十部門關於推動交通運輸與能源融合發展的指導意見》) promulgated by the Ministry of Transport, the NDRC, the MIIT, the Ministry of Natural Resources, the National Energy Administration, the National Railway Administration, the Civil Aviation Administration of China, the State Post Bureau, State Grid Corporation of China and China Southern Power Grid on March 26, 2025, by 2035, comprehensive integration and interaction between transport and the new energy system shall be advanced, with the preliminary establishment of a transport energy consumption system characterized by clean, low-carbon energy consumption as the mainstay, technological innovation as the key support, and green, intelligent, and efficient practices as the guiding principle. Purely electric vehicles shall become the mainstream among newly sold vehicles, new energy heavy-duty trucks shall see large-scale application in operations, and the green fuel supply system for transport shall be fundamentally established. The guidelines recommend strengthening standardization and regulatory support. Efforts will be made to advance the formulation and revision of standards related to clean energy development and utilization in transport infrastructure, electric heavy-duty trucks, hydrogen-powered heavy-duty trucks, electric vessels, vehicle-to-grid interaction, power batteries, charging (and battery swapping) stations, and hydrogen refuelling stations. Standards concerning safety, energy conservation, and environmental protection will be improved.

REGULATIONS RELATING TO PRODUCT QUALITY AND RECALL OF DEFECTIVE AUTOMOBILE PRODUCTS

According to the Product Quality Law of the PRC (《中華人民共和國產品質量法》) promulgated by the SCNPC on February 22, 1993, latest amended on December 29, 2018, and effective on the same day, the market regulatory authorities of the State Council are responsible for the supervision and administration of the quality of products. Producers and sellers are prohibited to produce or sell industrial products that do not meet the standards and requirements for the protection of human health and safety of persons and property. Producers shall be responsible for the quality of the products they produce, and the products shall not pose unreasonable risk of danger to the safety of persons or property. If a defect in the product causes damage to the person or property of others, the victim may claim compensation from the producer of the product or from the seller of the product. Producers or sellers who produce or sell substandard products will be ordered to cease production and sales, the illegally produced or sold products will be confiscated, and a fine will be imposed. Illegal income from sales of such products will be confiscated, and in severe cases, the offender's business license may be revoked. If it constitutes a crime, criminal responsibility will be pursued in accordance with the laws.

According to the Regulations on the Administration of the Recall of Defective Automobile Products (《缺陷汽車產品召回管理條例》) promulgated by the State Council on October 22, 2012 and amended on March 2, 2019, the product quality supervision department of the State Council shall be responsible for the national supervision and administration of the recall of defective automobile products. If an automobile producer learns that an automobile product may be defective, it shall immediately organize an investigation and analysis, and truthfully report the investigation and analysis results to the product quality supervision department of the State Council. If an automobile producer confirms that the automobile products are defective, it shall immediately stop producing, selling, and importing defective automobile products, and implement a recall of all defective automobile products. At the same time, a recall plan shall be formulated and filed with the product quality supervision and administration department of the State Council. If the producer fails to implement a recall, the product quality supervision department of the State Council shall order the recall. Automobile producers who conceal defects, refuse to recall after being ordered to do so, or fail to stop production, sales, or import of defective automobile products will be ordered to make corrections and fined. If there is any illegal income, the illegal income will also be confiscated, and in severe cases, relevant license shall be revoked by the licensing authority.

REGULATIONS RELATING TO COMPULSORY PRODUCT CERTIFICATION

According to the Certification and Accreditation Regulations of the PRC (《中華人民共和國認證認可條例》) promulgated by the State Council on September 3, 2003, last amended and effective from July 20, 2023, and the Administrative Regulations on Compulsory Product Certification (amended in 2022) (《強制性產品認證管理規定》(2022年修訂)) promulgated by the State Administration for Market Regulation (hereinafter referred to as "**SAMR**") on July 3, 2009, amended on September 29, 2022, and effective on November 1, 2022, the SAMR is in charge of the compulsory product certification nationwide, and is responsible for the organization, implementation, supervision, administration, and comprehensive coordination of the compulsory product certification of the whole country, while local market regulation and administration authorities at county level or above are responsible for the supervision and administration of compulsory product certification activities within their jurisdiction.

With respect to products which are subject to compulsory product certification, China has issued a uniform catalogue of products, uniform compulsory technical requirements, standards and compliance review procedures, uniform certification signs, and uniform fee-charging standards.

REGULATIONS RELATING TO INTELLIGENT CONNECTED VEHICLES AND AUTONOMOUS DRIVING

Pursuant to the Rules for the Administration of the Road Testing and Demonstrative Application of Intelligent Connected Vehicles (for Trial Implementation) (《智能網聯汽車道路測試與示範應用管理規範(試行)》) jointly issued by the MIIT, the Ministry of Public Security, and the Ministry of Transport on July 27, 2021 and effective on September 1, 2021, any entity intending to conduct a road testing of intelligent connected vehicles must obtain a temporary vehicle license plate for each tested vehicle. The tested vehicle must be equipped with the functions of recording, storing, and real-time monitoring the condition of the vehicle and is able to transmit real-time data of the vehicle, such as labelling, mode of control, location, speed, acceleration and direction of vehicles; the applicant entity must sign an employment contract or a labor service contract with the driver of the tested vehicle, while the driver must be a licensed driver for the relevant model with more than three years of driving experience and a track record of safe driving and is familiar with the testing protocol for autonomous driving system and proficient in operating the system. In addition, the testing entity is required to submit to the relevant competent authorities of provincial and municipal governments a periodical testing report every six months and a final testing report within one month after completion of the road testing. In the case of a car accident-causing severe injury or death of personnel or vehicle damage, the testing entity must report the accident to the relevant authority within 24 hours and submit a complete accident analysis report covering the cause of the accident, final liability allocation results, etc. within five working days after the traffic enforcement agency determines the liability for the accident.

Pursuant to the Implementation Rules for the Administrative Specifications on Road Testing and Demonstration Applications of Intelligent and Connected Vehicles in Anhui Province (for Trial Implementation) (《安徽省智能網聯汽車道路測試與示範應用管理規範實施細則(試行)》) jointly issued and implemented by the Department of Industry and Information Technology of Anhui Province, the Public Security Department of Anhui Province, and the Department of Transport of Anhui Province on April 2, 2025, road testing entities shall submit the certificates and supporting documents required under the Provisions on Motor Vehicle Registration to the traffic management authority of the public security organ at the location of the road test to apply for temporary driving license plates for test motor vehicles.

Pursuant to the Measures for the Administration of Road Testing and Demonstration Applications of Autonomous Vehicles in Beijing (for Trial Implementation) (《北京市自動駕駛汽車道路測試與示範應用辦法(試行)》) jointly issued and implemented by the Beijing Municipal Bureau of Economy and Information Technology, the Beijing Municipal Commission of Transport, the Traffic Management Bureau of the Beijing Municipal Public Security Bureau, and the Administrative Committee of Beijing Economic-Technological Development Area on October 24, 2025, entities applying to conduct road testing or demonstrative application activities shall submit application materials to the Beijing Municipal Bureau of Economy and Information Technology, the Beijing Municipal Commission of Transport, the Traffic Management Bureau of the Beijing Municipal Public Security Bureau, the Beijing Municipal Commission of Planning and Natural Resources, the Cyberspace Administration of the Beijing Municipal Committee, and the Beijing Municipal Office for the Coordinated Development of Smart City Infrastructure and Intelligent Connected Vehicles. Following a standardized, convenient, and efficient process of document review and expert evaluation, the traffic management authority of the public security organ shall issue temporary driving license plates for test motor vehicles.

Pursuant to the Interim Administrative Measures for Road Testing, Demonstration Applications, and Commercial Pilots of Intelligent and Connected Vehicles in Inner Mongolia Autonomous Region (《內蒙古自治區智能網聯汽車道路測試、示範應用和商業化試點管理辦法(暫行)》) jointly issued and implemented by the Department of Industry and Information Technology of the Inner Mongolia Autonomous Region, the Public Security Department of the Inner Mongolia Autonomous Region, and the Department of Transport of the Inner Mongolia Autonomous Region on July 22, 2025, temporary driving license plates for test motor vehicles obtained by road testing, demonstrative application, or commercial pilot entities from the local traffic management authority of the public security organ may be used for driving on designated sections of all categories of roads open to social motor vehicles within the administrative area of the Inner Mongolia Autonomous Region, including highways (such as expressways and arterial roads) and urban roads.

REGULATIONS RELATING TO SPECIAL EQUIPMENT SAFETY

According to the Law of the PRC on Special Equipment Safety (《中華人民共和國特種設備安全法》) promulgated by the SCNPC on June 29, 2013, effective on January 1, 2014, Special equipment user entities shall, within thirty (30) days before or after the equipment is put into use, go through registration to authorities in charge of special equipment safety and obtain use registration certificates. Registration marks shall be put at the prominent positions of special equipment.

REGULATIONS ON INCORPORATION, FOREIGN INVESTMENT AND RESTRICTION IN VALUE-ADDED TELECOMMUNICATIONS SERVICES

All companies established in the PRC are subject to the PRC Company Law (《中華人民共和國公司法》), which was promulgated by the SCNPC on December 29, 1993 and lasted amended on December 29, 2023 and effective on July 1, 2024. The PRC Company Law provides for the establishment, corporate structure and corporate management of companies, which also applies to foreign-invested enterprises. Where laws relating to foreign investment provide otherwise, such stipulations shall apply.

According to the Foreign Investment Law of the PRC (《中華人民共和國外商投資法》) promulgated by the National People's Congress on March 15, 2019 and the Implementation Regulations for the Foreign Investment Law of the PRC (《中華人民共和國外商投資法實施條例》) promulgated by the State Council on December 26, 2019, and both of which came into effect on January 1, 2020, Investments by foreign investors in fields for which investment is restricted by the Negative List shall comply with the restrictive admission special administrative measures such as equity requirements, senior management personnel requirements stipulated by the Negative List.

According to the Special Administrative Measures (Negative List) for the Access of Foreign Investment (2024) (《外商投資准入特別管理措施(負面清單)(2024年版)》) (hereinafter referred to as the "**2024 Negative List**") promulgated by the MOFCOM and NDRC on September 6, 2024 and effective on November 1, 2024, as well as the Catalogue of Industries for Encouraging Foreign Investment (2022) (《鼓勵外商投資產業目錄》(2022年版)) promulgated by the NDRC and MOFCOM on October 26, 2022 and effective on January 1, 2023, the research, development and sales of NEVs is not a prohibited or restricted industry of foreign investment. Any industry not included in the 2024 Negative List shall be administered under the principle of equal treatment to domestic and foreign investment.

Pursuant to the 2024 Negative List, the provision of value-added telecommunications services falls into the restricted category (except for e-commerce, domestic multi-party communications, and store-and-forward and call center services) and the foreign shareholding ratio shall not exceed 50%.

Pursuant to the Circular of Ministry of Industry and Information Technology concerning Lifting Restrictions on the Proportion of Foreign Equity in On-line Data Processing and Transaction Processing Business (for-profit E-commerce) (《工業和信息化部關於放開在線數據處理與交易處理業務(經營類電子商務)外資股比限制的通告》) promulgated by the MIIT on June 19, 2015 and effective from the same day, the limitation on the proportion of foreign equity in on-line data processing and transaction processing business (for-profit E-commerce) has been released throughout the country, with the maximum proportion of foreign equity of 100%.

According to the Measures for the Reporting of Foreign Investment Information (《外商投資信息報告辦法》), which were promulgated by the MOFCOM and the SAMR on December 30, 2019, and came into effect on January 1, 2020, foreign investors or foreign-invested enterprises shall submit investment information in a timely manner, follow the principles of truthfulness, accuracy and completeness, and shall not make false or misleading reports or material omissions. Where a foreign-invested enterprise invests (including multi-level investment) to establish an enterprise in the PRC, the relevant information shall be forwarded by the market supervision department to the competent department in charge of commerce after the registration and filing with the market supervision department and the submission of the annual report information.

REGULATIONS RELATING TO DIVIDEND DISTRIBUTION

The Company Law of the PRC (《中華人民共和國公司法》) and the Foreign Investment Law of the PRC (《中華人民共和國外商投資法》) are the main laws and regulations regulating the dividend distribution of foreign-invested enterprises in the PRC. According to the regulatory mechanism provided by the abovementioned laws, a foreign-invested enterprise in the PRC may only pay dividends out of accumulated profits (if any) determined in accordance with the PRC accounting standards and regulations. The PRC companies (including foreign-invested enterprises) are required to draw at least 10% of their after-tax profits into the statutory reserve fund until the relevant reserve fund reaches 50% of their registered capital, except as otherwise provided by the laws on foreign investment. After having accrued statutory reserve from the after-tax profits, a company can also set aside discretionary reserve from the after-tax profits upon a resolution made by the shareholders' meeting. Where the reserve of a company is used for making up losses, the discretionary reserve and statutory reserve shall be firstly used. If losses still cannot be made up, the capital reserve can be used according to the relevant provisions. No profit shall be distributed before making up any loss in the previous fiscal years. Retained profits for previous fiscal years may be distributed together with distributable profits for the current fiscal year.

REGULATIONS RELATING TO CYBERSECURITY, DATA PROTECTION, PERSONAL INFORMATION PROTECTION AND AUTOMOTIVE DATA SECURITY

Cybersecurity and Data Protection

Pursuant to the Cybersecurity Law of the PRC (《中華人民共和國網絡安全法》) issued by the SCNPC on November 7, 2016 and implemented on June 1, 2017, an amendment of which has been issued on October 28, 2025 and came into effect on January 1, 2026, (the "**Cybersecurity Law**"), the state shall implement rules for graded protection of cybersecurity. Network operators shall, according to the requirements of the rules for graded protection of cybersecurity, develop internal security management mechanisms, and take technical measures and other necessary measures to ensure network is free from interference, disruption or unauthorized access, and prevent network data from being disclosed, stolen or tampered. Network operators in violation of the provisions of this law may be subject to penalties, such as being ordered to make rectifications, given warnings or fines, confiscated of unlawful gains, ordered a temporary suspension of operations, a suspension of business for corrections, a shutting down of websites, a revocation of relevant operations permits, etc.

The Administrative Provisions on Security Vulnerability of Network Products (《網絡產品安全漏洞管理規定》) was jointly promulgated by the MIIT, the CAC, and the Ministry of Public Security on July 12, 2021, and became effective on September 1, 2021. Network product providers and network operators as well as organizations or individuals engaging in the discovery, collection, release, and other activities of network product security vulnerability are subject to the Provisions and shall establish channels to receive information of security vulnerability of their respective network products and shall examine and fix such security vulnerability in a timely manner. Network operators who violate the Provisions shall be dealt with by the relevant competent authorities in accordance by the law, and those who constitute relevant violations under the Cybersecurity Law shall be punished in accordance with the Cybersecurity Law.

According to the Regulations on Protecting the Security of Critical Information Infrastructure (《關鍵信息基礎設施安全保護條例》) promulgated by the State Council on July 30, 2021, and effective on September 1, 2021, critical information infrastructure means network facilities and information systems in important industries and fields — such as public communication and information services, energy, transportation, irrigation, finance, public services, e-government, and science and technology industries for national defense, and the important network facilities and information systems that may seriously endanger national security, national economy and people's livelihood, and public interests in the event that they are damaged or lose their functions or their data are leaked. According to the Regulations on the Security Protection of Critical Information Infrastructure, the relevant government departments are responsible for formulating rules for the determination of critical information infrastructure with reference to a number of factors stipulated in the Regulations, and for further determining the critical information infrastructure operators ("**CIIO**") in the relevant industries on the basis of such rules. The relevant authorities shall also notify the operator that it is recognized as a CIIO.

On December 28, 2021, the revised Cybersecurity Review Measures (《網絡安全審查辦法》) (the "**CAC Measures**") was jointly promulgated by the CAC and twelve other governmental authorities, formally became effective on February 15, 2022. According to the CAC Measures, operators of online platforms handling personal information of more than one million users must apply for a cybersecurity review with the Cybersecurity Review Office when they are seeking for listing in a foreign country (國外上市). In the meantime, the member organizations of the cybersecurity review working mechanism have the discretion to initiate a cybersecurity review on any network product or service, or any data processing activity if they deem such network product, or service, or data processing activity affects or may affect national security. On March 21, 2025, the Company and the Company's PRC Legal Adviser have conducted a real-name telephone consultation and communication with the competent regulatory authority, the China Cybersecurity Review, Certification and Market Regulation Big Data Center (中國網絡安全審查認證和市場監管大數據中心, the "**CCRC**"), and CCRC has confirmed that a **[REDACTED]** in Hong Kong does not fall within the scope of the term of "listing abroad (國外上市)" under Article 7 of the CAC Measures, and CCRC did not raise any objection to our **[REDACTED]**, nor did CCRC give any specific instructions requiring us to apply for cybersecurity review for the **[REDACTED]**. Given that (i) as of the Latest Practicable Date, we had not been notified by any relevant authorities as a CIIO; (ii) CCRC has confirmed that **[REDACTED]** in Hong Kong does not constitute a listing abroad (國外上市); and (iii) during the Track Record Period and as of the Latest Practicable Date, we had not received any notice that we are required to conduct a cybersecurity review or our product, service, or data processing activity affects or may affect national security, and the interpretation of products, services or data processing activities that "affect or may affect national security" under the current PRC laws and regulations requires further clarification from the competent authorities, therefore, as advised by our PRC Legal Adviser, we were of the view that the CAC Measures is not applicable to us to the extent that we are not obliged to apply for a cybersecurity review pursuant to the CAC Measures with respect to our **[REDACTED]**. However, as further advised by our PRC Legal Adviser, the interpretation and implementation of these laws and regulations with respect to the cybersecurity review keep evolving, we cannot assure you that there will not be any additional regulatory requirements regarding the cybersecurity review relating to the new laws and regulations, and we are suggested by our PRC Legal Adviser that we should keep abreast of the applicable laws and regulations in this regard and implement all necessary measures in a timely manner to ensure compliance with the relevant laws and regulations.

On September 24, 2024, the Cyber Data Security Regulations (《網絡數據安全管理條例》) was promulgated by the State Council and came into effect on January 1, 2025. The Cyber Data Security Regulations reiterate the general regulations for data processing activities and rules of personal information protection, important data security protection, network data cross-border transfer management, and internet platform service providers' obligations. The Cyber Data Security Regulations do not include the content related to cybersecurity review standards for listing abroad and in Hong Kong in the Administration Governing the Cyber Data Security (Draft for Comments), published on November 14, 2021.

According to the Data Security Law of the PRC (《中華人民共和國數據安全法》) passed by the SCNPC on June 10, 2021 and implemented on September 1, 2021, the state establishes a classified and tiered system for data protection. When conducting data processing activities, one shall comply with laws and regulations, establish a sound, full-range data security and management system, organize and conduct data security education and training as well as take corresponding technical measures and other necessary measures to protect data safety. The use of the internet and other information networks to carry out data processing activities shall, on the basis of the rules for graded protection of cybersecurity, fulfill the aforesaid obligations of data security protection. The processors of important data shall, in accordance with relevant provisions, carry out risk assessment on their data processing activities on a regular basis and submit risk assessment reports to the relevant competent authorities. Those who fail to fulfill the obligations of data security protection and provide important data abroad in violation of the law will be ordered to correct, warned, fined, suspended with their business or suspended for rectification, or revoked of relevant business licenses.

According to the Several Provisions on Administration of Automobile Data Security (For Trial Implementation) (《汽車數據安全管理若干規定(試行)》) ("**Several Provisions on Automobile Data**") jointly promulgated by the CAC, the NDRC, the MIIT, the Ministry of Public Security, and the Ministry of Transport on August 16, 2021, and effective on October 1, 2021, automobile data processors (including automobile manufacturers, components and parts and software suppliers, dealers, maintenance organizations, and mobility service enterprises) shall process automobile data (including personal information data and important data involved during the design, production, sales, use, operation, and maintenance of vehicles) in a lawful, legitimate, specific and clear manner. Automobile data processors are encouraged by the Several Provisions on Automobile Data to adhere to the following principles: the principle of in-vehicle processing, i.e., do not transfer data out of the vehicle unless it is indeed necessary; the principle of non-collection by default; the principle of appropriate accuracy and coverage; and the principle of data desensitization. Automobile data processors processing personal information shall obtain consent from the person whose personal information is being processed or comply with other requirements stipulated in laws and administrative regulations. If the automobile data processors collect personal information outside the vehicle and transmit the data out of the vehicle for the purpose of ensuring driving safety, but are unable to obtain personal consent, the automobile data processors shall anonymize the data by means such as deleting the pictures containing identifiable natural persons or partially contouring the facial information in the pictures. The Several Provisions on Automobile Data also provides that important data means data that may endanger national security, public interests, or lawful rights and interests of individuals or organizations once it has been tampered with, destroyed, leaked, or illegally obtained or used, including but not limited to data of important sensitive areas, data reflecting economic performance, operating data of vehicle charging networks, personal information involving more than 100,000 personal information subjects, video and image data outside the vehicles that contain face information, license plate information, etc. Important data shall be stored domestically by laws.

On December 8, 2022, the MIIT issued the Administrative Measures for Data Security in the Field of Industry and Information Technology (Trial Implementation) (《工業和信息化領域數據安全管理辦法(試行)》), or the MIIT Data Security Measures, which took effect on January 1, 2023. The MIIT Data Security Measures prescribes that data processors in the field of industry and information technology shall follow the principles of lawfulness and appropriateness in collecting data. During the data collection process, the data processors shall take corresponding security measures based on the data security level.

On July 7, 2022, the CAC officially issued the Measures on Security Assessment of Cross-border Data Transmission (《數據出境安全評估辦法》), which became effective and was implemented on September 1, 2022. Based on the Measures, data processors shall apply for the security assessment of data cross-border transfer to the national cyberspace administration through the provincial cyberspace administration in the place where they operate if they provide data outside China and fall into one of the following conditions: (1) data processors provide important data outside China; (2) operators of critical information infrastructure and data processors who process personal information of over 1 million users provide personal information outside China; (3) data processors who provide accumulative personal information of over 100,000 users or accumulative sensitive personal information of over 10,000 users outside China from January 1 of previous year provide personal information outside China; (4) other situations required to apply for the security assessment for data cross-border transfer as stipulated by the national cyberspace administration.

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

Personal Information Protection

Pursuant to the PRC Civil Code (《中華人民共和國民法典》) adopted by the National People's Congress on May 28, 2020, and effective on January 1, 2021, personal information of natural persons is protected by law. Any organization or individual must legally obtain the relevant personal information of others and must ensure the security of the relevant information, and must not illegally collect, use, process, or transmit the personal information of others, nor illegally trade, provide, or disclose the personal information of others.

According to the Personal Information Protection Law of the PRC (《中華人民共和國個人信息保護法》) ("**Personal Information Protection Law**") adopted by the SCNPC on August 20, 2021, and effective on November 1, 2021, personal information of natural persons is protected by law. No organization or individual may infringe upon natural persons' rights and interests relating to personal information. The Personal Information Protection Law integrates previously scattered rules on personal information rights and privacy protection, and initially establishes a personal information protection system. The Law clarifies that personal information shall be processed under the principles of lawfulness, legitimacy, necessity, and good faith and shall be processed for a clear and reasonable purpose, directly related to the processing purpose and in a manner that has the minimum impact on the rights and interests of individuals, and limited to the minimum scope necessary for achieving the processing purpose. The Personal Information Protection Law provides that a personal information processor may process personal information in accordance therewith on the basis of the six circumstances already specified thereunder. No organization or individual may illegally collect, use, process, or transmit personal information, illegally buy or sell, provide or make personal information public, or engage in the processing of personal information that endangers the national security or public interests. The Personal Information Protection Law clarifies the definition of "sensitive personal information", which means personal information that, once leaked or illegally used, may give rise to discrimination against individuals or endanger personal or property security, including information on biometrics, religious beliefs, specific identifications, medical health, financial accounts, and personal whereabouts, among others. Where a personal information processor processes sensitive personal information with the individual's consent, a separate consent shall be obtained from the individual. Where any law or administrative regulation provides that written consent shall be obtained for processing sensitive personal information, such provision shall prevail.

REGULATIONS RELATING TO INTELLECTUAL PROPERTY RIGHTS

Patents

According to the Patent Law of the PRC (《中華人民共和國專利法》) promulgated by the SCNPC on March 12, 1984, last amended on October 17, 2020, and effective on June 1, 2021, China National Intellectual Property Administration shall be responsible for administration of the patent work across the country and the administrative departments for patent work under the people's governments at the provincial level shall be responsible for the administration of patent work within their respective administrative areas. Any invention or utility model for which a patent right may be granted must meet three conditions: novelty, inventiveness, and practical applicability. A patent is valid for a twenty-year term for an invention, a ten-year term for a utility model, and a fifteen-year term for design. Except under certain specific circumstances provided by law, any third-party user must obtain consent or a proper license from the patent owner to use the patent, otherwise it will constitute an infringement of the rights of the patent owner.

Copyrights

Pursuant to the Copyright Law of the PRC (《中華人民共和國著作權法》) promulgated by the SCNPC on September 7, 1990, last amended on November 11, 2020, and effective on June 1, 2021, copyrights include personal rights such as the right of publication and that of attribution, as well as property rights such as the right of reproduction and that of distribution. Copyright protection extends to internet activities, products, and software products transmitted through the internet. Reproducing, distributing, performing, projecting, broadcasting, compiling a work, or communicating the same to the public via an information network without permission from the owner of the copyright therein, unless otherwise provided under the Copyright Law of the PRC, shall constitute infringement of copyrights. The infringer shall, bear civil liabilities, such as ceasing the infringement, eliminating the impact, making an apology, and compensating for the loss.

According to the Regulations on the Protection of Computer Software (《計算機軟件保護條例》) promulgated by the State Council on June 4, 1991, last amended on January 30, 2013 and implemented on March 1, 2013, computer software must be independently developed by the developer and has been fixed on certain tangible object. Software developed by Chinese citizens, legal persons, or other organizations, whether published or not, shall be entitled to the copyright in accordance with this Regulation. Software copyright owners may register with a software registration agency recognized by the copyright administrative department of the State Council. The registration certificate issued by the software registration agency shall be the preliminary evidence of the registration.

Trademarks

Pursuant to the Trademark Law of the PRC (《中華人民共和國商標法》) promulgated by the SCNPC on August 23, 1982, last amended on April 23, 2019, and effective on November 1, 2019, and the Implementation Rules of the Trademark Law of the PRC (《中華人民共和國商標法實施條例》) promulgated by the State Council on August 3, 2002, and amended on April 29, 2014 and implemented on May 1, 2014, registered trademarks in China include commodity trademarks, service trademarks, collective marks, and certification marks.

The Trademark Office of China National Intellectual Property Administration is responsible for trademark registration and administration in China. The period of validity of a registered trademark shall be ten years. If a registrant needs to continue to use the registered trademark after the period of validity, an application for renewal of registration shall be made every ten years. Application for renewal of registration shall be submitted within 12 months prior to the expiry date. The first to file principle is adopted in the registration of trademarks in China. Where trademark for which a registration application has been made is identical or similar to another trademark which has already been registered or been subject to a preliminary examination and approval for use on the same kind of or similar commodities or services, the application for registration of such trademark may be rejected. Applying for registration of a trademark shall not prejudice the existing right first obtained by others, nor could any person register in advance a trademark that has already been used by another party and has already gained a sufficient degree of reputation through such party's use. Using a trademark identical or similar to the registered trademark on the same or similar commodities without the permission of the trademark registrant constitutes an infringement on the exclusive right to use a registered trademark. The infringer shall, in accordance with the regulations, undertake to cease the infringement, take remedial measures, and compensate for losses.

Domain Names

In accordance with the Administrative Measures on Domain Names (《互聯網域名管理辦法》) promulgated by the MIIT on August 24, 2017, and effective on November 1, 2017, the MIIT supervises and administrates the domain name service nationwide. Domain name registrations are handled through domain name service agencies established under the relevant regulations, and applicants become domain name holders upon successful registration.

REGULATIONS RELATING TO FOREIGN EXCHANGE

Pursuant to the Regulations on the Administration of Foreign Exchange of the PRC (《中華人民共和國外匯管理條例》) promulgated by the State Council on January 29, 1996, and last amended and effective on August 5, 2008, matters on foreign exchange administration in China can be divided into current accounts (such as trade-related income and expenses and payments of interest and dividends) and capital accounts (such as direct equity investment, loans and divestment). Funds under current accounts or capital accounts can only be remitted in or out after going through foreign exchange (such as settlement or purchase) related procedures upon obtaining necessary permits and reasonable review.

The Circular of the State Administration of Foreign Exchange on Further Improving and Adjusting Foreign Exchange Administration Policies on Direct Investment (《國家外匯管理局關於進一步改進和調整直接投資外匯管理政策的通知》) (hereinafter referred to as the "**Circular 59**"), which was promulgated by the State Administration of Foreign Exchange (hereinafter referred to as the "**SAFE**") on November 19, 2012, and last amended on October 10, 2018, part of which was abolished on December 30, 2019, substantially amends and simplifies the foreign exchange procedures. Pursuant to Circular 59, the opening of various special purpose foreign exchange accounts, such as pre-establishment expenses accounts, foreign exchange capital accounts, and deposits accounts, the reinvestment of RMB proceeds derived by foreign investors within the PRC, and remittance of foreign exchange profits and dividends by a foreign-invested enterprise to its foreign shareholders no longer require the approval or verification of the SAFE, and multiple capital accounts for the same entity may be opened in different provinces. In February 2015, the SAFE promulgated the Notice on Further Simplifying and Improving Foreign Exchange Administration Policies on Direct Investment (《關於進一步簡化和改進直接投資外匯管理政策的通知》) (hereinafter referred to as the "**Circular 13**"), part of which was abolished in December 2019. It stipulates that banks shall, on behalf of the SAFE, directly examine and handle foreign exchange registration under domestic direct investment and overseas direct investment, and the SAFE and its branches shall exercise indirect supervision over foreign exchange registration of direct investment through banks.

Pursuant to the Notice on Issues Concerning the Administration of Foreign Exchange in Overseas Listing (《關於境外上市外匯管理有關問題的通知》) promulgated by the SAFE on December 26, 2014 and effective on the same date, a domestic company shall, within 15 working days from the date of the end of its overseas listing, register the overseas listing with the administration of foreign exchange at the place of its establishment. The proceeds from an overseas listing of a domestic company may be remitted to the domestic account or deposited in an overseas account, but the use of the proceeds shall be consistent with the relevant content included in the document and other disclosure documents.

Pursuant to the Notice of the State Administration of Foreign Exchange on Reform of the Management Method for the Settlement of Foreign Exchange Capital of Foreign-Invested Enterprises (《國家外匯管理局關於改革外商投資企業外匯資本金結匯管理方式的通知》) (hereinafter referred to as the "**Circular 19**"), which was promulgated on March 30, 2015, became effective on June 1, 2015, and partially abolished on December 30, 2019 and March 23, 2023, respectively, foreign-invested enterprises could settle their foreign exchange capital on a discretionary basis based on the actual needs of their business operations. Foreign invested enterprises are prohibited from using the foreign exchange capital settled in RMB: (1) for any expenditures beyond the business scope of the foreign-invested enterprises or forbidden by laws and regulations; (2) for direct or indirect securities investment; (3) to provide entrusted loans (unless permitted in the business scope), repay inter-company loans (including advances to third parties) or repay RMB bank loans that have been on-lent to a third party; and (4) to purchase real estate not for self-use purposes (save for real estate enterprises). Pursuant to the Notice of the State Administration of Foreign Exchange on Reforming and Standardizing the Foreign Exchange Settlement

Management Policies of Capital Accounts (《國家外匯管理局關於改革和規範資本項目結匯管理政策的通知》) (hereinafter referred to as the "**Circular 16**") promulgated and implemented by the SAFE on June 9, 2016 and partially amended on December 4, 2023, discretionary foreign exchange settlement applies to foreign exchange capital, foreign debt offering proceeds, and remitted foreign listing proceeds, and the corresponding RMB capital converted from foreign exchange may be used to extend loans to related parties or repay inter-company loans (including advances by third parties). However, there remain substantial uncertainties with respect to Circular 16's interpretation and implementation in practice.

On January 26, 2017, the SAFE issued and implemented on the same date the Notice on Improving the Check of Authenticity and Compliance to Further Promote Foreign Exchange Management Reform (《關於進一步推進外匯管理改革完善真實合規性審核的通知》) (hereinafter referred to as the "**Circular 3**"), which stipulates several capital control measures with respect to the outbound remittance of profits from domestic entities to offshore entities, including (1) when handling remittance of profit at an amount of over US$50,000 for domestic institutions, banks shall review board resolutions regarding profit distribution, the original version of tax filing records and audited financial statements to check if the transactions are genuine; and (2) domestic entities shall make up for previous year's losses before remitting the profits. In addition, pursuant to Circular 3, domestic entities shall make detailed explanations to the bank in respect of the sources of the capital and its utilization arrangements, and provide board resolutions, contracts, and other supporting materials when undergoing the filing procedures in connection with an outbound investment.

On October 23, 2019, the SAFE promulgated the Notice on Further Facilitating Cross-Board Trade and Investment (Hui Fa [2019] No. 28) (《關於進一步促進跨境貿易投資便利化的通知》(匯發[2019]28號)) which became effective on the same date (except for Clause 2 of Article 8, which became effective on January 1, 2020, and was partly amended on December 4, 2023). The Notice cancels restrictions on domestic equity investments made with capital funds by non-investing foreign-funded enterprises. In addition, restrictions on the use of funds for foreign exchange settlement of domestic accounts for the realization of assets have been removed and restrictions on the use and foreign exchange settlement of foreign investors' security deposits have been relaxed. Eligible enterprises in the pilot areas are also allowed to use revenue under capital accounts, such as capital funds, foreign debt offering proceeds, and remitted foreign listing proceeds for domestic payments without providing supporting materials to the bank in advance for authenticity verification on an item by item basis, while the use of funds should be true, in compliance with applicable rules and conforming to the current administrative regulations for use of revenue from capital accounts.

According to the Notice on Optimizing Foreign Exchange Management to Support the Development of Foreign Businesses (《關於優化外匯管理支持涉外業務發展的通知》) issued by the SAFE on April 10, 2020, eligible enterprises are allowed to use revenue under capital accounts, such as capital funds, foreign debt offering proceeds, and remitted foreign listing proceeds for domestic payments without providing supporting materials to the bank in advance for authenticity verification; provided that the use of funds should be true, in compliance with applicable rules and conforming to the current administrative regulations for use of revenue from capital accounts. Relevant banks should conduct spot checks in accordance with relevant provisions.

REGULATIONS RELATING TO TAXATION

Enterprise Income Tax (EIT)

According to the Enterprise Income Tax Law of the PRC (《中華人民共和國企業所得稅法》) amended by the SCNPC and came into effect on December 29, 2018, and the Implementation Rules of the Enterprise Income Tax Law of the PRC (《中華人民共和國企業所得稅法實施條例》) amended by the State Council and came into effect on April 23, 2019, an enterprise which is established within the PRC in accordance with the laws or established in accordance with any laws of foreign country (region) but with an actual management entity within the PRC shall be regarded as a resident enterprise. A resident enterprise shall be subject to an EIT of 25% of any income generated within or outside the PRC. Preferential enterprise income tax is granted to industries and projects that are supported and encouraged by the country. High and new technology enterprises that need key support of the country are entitled to enjoy the reduced enterprise income tax rate of 15%.

Business Tax and Value-added Tax (VAT)

According to the Interim Regulations on Value-added Tax of the PRC (《中華人民共和國增值稅暫行條例》) by the State Council, as well as the Implementation Rules for the Interim Regulations on Value-Added Tax of the PRC (《中華人民共和國增值稅暫行條例實施細則》) by the MOF and the STA, any entities and individuals engaged in the sale of goods or provision of processing, repair and replacement services, and import of goods within the territory of the PRC are taxpayers of VAT and shall pay the VAT in accordance with the laws and regulations. The rate of VAT for sale of goods is 13% unless otherwise specified, such as the rate of VAT for sale of transportation services is 9%.

REGULATIONS RELATING TO EMPLOYMENT

Pursuant to the PRC Labor Law (《中華人民共和國勞動法》) and the PRC Labor Contract Law (《中華人民共和國勞動合同法》), employers must execute written labor contracts with full-time employees. All employers must comply with local minimum wage standards. In addition, according to the PRC Social Insurance Law (《中華人民共和國社會保險法》) and the Regulations on the Administration of Housing Funds (《住房公積金管理條例》), employers are required to establish a social insurance system and other employee benefits including pension insurance, medical insurance, work-related injury insurance, unemployment insurance, maternity insurance and housing provident fund, which can be collectively referred to as the "Employee Benefits". Employers shall open the social insurance and housing provident fund accounts and to make adequate contributions of Employee Benefits for their employees. The PRC Social Insurance Law (《中華人民共和國社會保險法》) provides that an employer that has not made social insurance contributions at a rate and based on an amount prescribed by the law, or at all, may be ordered to rectify the non-compliance and pay the required contributions within a stipulated deadline and be subject to a late payment fine at a daily rate of 0.05% per day of the outstanding amount. If the employer still fails to rectify the failure to make social insurance contributions within the stipulated deadline, it may be subject to a fine ranging from one to three times of the amount overdue. Pursuant to the Regulations on the Administration of Housing Funds (《住房公積金管理條例》), in the event that the payment and deposit of the housing fund is not made in full or at all in time by an employer, the housing provident fund management center may order it to make the payment and deposit within a prescribed period, and where the payment and deposit has not been made within the prescribed period, an application may be made to the PRC courts for compulsory enforcement.

In addition, according to the Interpretation II of the Supreme People's Court on Issues Concerning the Application of Law in the Trial of Labor Dispute Cases (《最高人民法院關於審理勞動爭議案件適用法律問題的解釋 (二)》), promulgated on July 31, 2025 and effective since September 1, 2025, any agreement between an employer and an employee, or any promise made by an employee to the employer, that social insurance contributions need not be paid shall be deemed invalid by the people's court. If the employer fails to pay social insurance contributions and the employee requests termination of the labor contract and payment of economic compensation, the people's court shall uphold such claims. After the employer has made up the contributions in accordance with the law, If the employer requests the employee to return the corresponding compensation already paid for social insurance, the people's court shall also support that claim.

REGULATIONS RELATING TO FILING OF OVERSEAS LISTING BY DOMESTIC ENTERPRISES

Pursuant to the Opinions on Strictly Cracking Down on Illegal Securities Activities in Accordance with the Law (《關於依法從嚴打擊證券違法活動的意見》) jointly promulgated and implemented by the General Office of the CPC Central Committee and the General Office of the State Council on July 6, 2021, it is required to strengthen the supervision of China concept stock companies and revise the special regulations on the overseas offering of shares and listing of these companies, and clarify the responsibilities of domestic industry supervising and regulatory authorities.

The Provisions on Strengthening the Confidentiality and File Management Work Related to the Overseas Issuance and Listing of Securities by Domestic Enterprises (《關於加強境內企業境外發行證券和上市相關保密和檔案管理工作的規定》) issued by the CSRC, the MOF, the State Secrecy Bureau and the State Archives Administration on February 24, 2023, and implemented on March 31, 2023, specifies that domestic enterprises that provide accounting files or copies of accounting files to relevant securities companies, securities service institutions, overseas regulatory institutions, and other units and individuals shall comply with the corresponding procedures in accordance with relevant regulations of the PRC. Work manuscripts generated in the PRC by securities companies and securities service institutions that provide corresponding services for overseas issuance and listing of securities by domestic enterprises shall be kept in the PRC. Where files need to be transferred outside of the PRC, it shall be subject to the approval procedures in accordance with relevant regulations of the PRC.

H SHARE FULL CIRCULATION

Full circulation means listing and circulation on the Stock Exchange of the domestic Unlisted Shares (including unlisted domestic shares held by domestic shareholders prior to overseas listing, unlisted domestic shares additionally issued after overseas listing, and Unlisted Shares held by foreign shareholders) of H-share companies. On November 14, 2019, the CSRC issued the Guidelines for the Full Circulation Program for Domestic Unlisted Shares of H-share Companies (《H股公司境內未上市股份申請全流通業務指引》), which was amended on August 10, 2023, allowing certain qualified H-share companies and H-share companies intended for listing to apply to the CSRC for full circulation. According to the Guidelines for the Full Circulation Program for Domestic Unlisted Shares of H-share Companies, shareholders of domestic Unlisted Shares may determine by themselves through consultation the amount and proportion of shares, with filing to the CSRC by an H-share company commissioned for this purpose. After the application for full circulation has been filed by the CSRC, an H-share company shall submit a report on the relevant situation to the CSRC within 15 days after the registration with the China Securities Depository and Clearing Corporation Limited (hereinafter referred to as the "**CSDC**") of the shares related to the application has been completed.