TAXATION OF SECURITIES HOLDERS

The taxation of income and capital gains of holders of H Shares is subject to the laws and practices of the PRC and of jurisdictions in which holders of H Shares are resident or otherwise subject to tax. The following summary of certain relevant taxation provisions is based on the laws in effect and relevant interpretations as at the Latest Practicable Date. All laws and interpretations are subject to changes or adjustments, which may have retrospective effect, and no corresponding comments or advice will be made. The discussion does not deal with all possible tax consequences relating to **[REDACTED]** in the H Shares, nor does it take into account the specific circumstances of any particular **[REDACTED]**, some of which may be subject to specific rules. Accordingly, you should consult your own tax adviser regarding the tax consequences of any **[REDACTED]** in H Shares.

The discussion does not address any tax issues of the PRC other than income tax, capital gains tax, profit tax, sales tax, value-added tax, stamp duty and estate tax. You should consult your advisers regarding the PRC and other tax consequences involved in the purchase, ownership and disposal of H Shares.

THE PRC TAXATION

Taxation on Dividends

Individual Investors

Pursuant to the Individual Income Tax Law of the PRC (《中華人民共和國個人所得稅法》), which was last amended on August 31, 2018 and the Implementation Provisions of the Individual Income Tax Law of the PRC (《中華人民共和國個人所得稅法實施條例》), which was last amended on December 18, 2018 (collectively referred to as the "**IIT Law**"), dividends distributed by the PRC enterprises are subject to individual income tax levied at a flat rate of twenty per cent. For a foreign individual who is not a resident of the PRC, the receipt of dividends from an enterprise in the PRC is normally subject to individual income tax of twenty per cent unless specifically exempted by the tax authority of the State Council or being eligible for any relief under the applicable tax treaties.

Pursuant to the Arrangement between the Mainland and the Hong Kong Special Administrative Region for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income (the "**Arrangement**"), signed on August 21, 2006 and implemented on December 8, 2006, the Chinese government may levy tax on dividends paid by Chinese companies to Hong Kong residents (including natural persons and legal entities), provided that the tax levied shall not exceed ten per cent of the total dividends payable by the Chinese company. Where a Hong Kong resident directly has twenty-five per cent or more of shareholding in a Chinese company, the tax levied shall not exceed five per cent of the total dividends payable by the Chinese company. The Fifth Protocol to the Arrangement between the Mainland and the Hong Kong Special Administrative Region for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes of Income (《國家稅務總局關於內地和香港特別行政區關於對所得避免雙重徵稅和防止偷漏稅的安排第五議定書》) issued by the State Administration of Taxation, which came into force on December 6, 2019, stipulates that the relevant provisions shall not apply to arrangements or transactions where one of the principal purposes is to obtain preferential tax treatment.

Pursuant to the Notice on Matters Concerning the Levy and Administration of Individual Income Tax after the Repeal of Guo Shui Fa [1993] No. 045 (《國家稅務總局關於國稅發 [1993] 045號文件廢止後有關個人所得稅徵管問題的通知》) issued by the State Administration of Taxation on June 28, 2011, dividend income received by overseas resident individual shareholders from shares issued in Hong Kong by domestic non-foreign-invested enterprises shall be classified under the category of "interest, dividends and bonuses", and the withholding agent shall withhold and remit personal income tax in accordance with the laws. When a domestic non-foreign-invested enterprise that issues shares in Hong Kong distributes dividends to non-resident individuals in jurisdictions with which the PRC has signed a tax treaty, individual income tax is generally withheld at a rate of 10%. Where the individual H shareholder receiving the dividends is a resident of a country that has signed a tax treaty with the PRC providing for a tax rate lower than 10%, the non-foreign-invested enterprise with shares listed in Hong Kong may apply on behalf of the relevant holder for entitlement to the lower preferential tax treatment. Upon the review and approval by the competent tax authority, any excess tax withheld shall be refunded. Where the individual H shareholder receiving dividends is a resident of a country that has signed a tax treaty with the PRC stipulating a tax rate higher than 10% but lower than 20%, the non-foreign-invested enterprise shall withhold tax at the rate specified in the treaty without the need to submit an application. Where the individual H shareholder receiving dividends is a resident of a country that has not signed a tax treaty with the PRC, or in other circumstances, the non-foreign-invested enterprise shall withhold tax at a rate of 20%.

Corporate investors

Pursuant to the Enterprise Income Tax Law of the PRC (《中華人民共和國企業所得稅法》), promulgated by the National People's Congress on March 16, 2007 and last amended on December 29, 2018, and the Implementation Provisions 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》), promulgated by the State Council on December 6, 2007 and last amended on December 6, 2024 (collectively referred to as the "**Enterprise Income Tax Law**"), where a non-resident enterprise does not have an establishment or premise within the territory of the PRC, or where the income derived has no actual connection with an establishment or premise although it has an establishment or premise, it shall generally be liable to pay a ten per cent enterprise income tax on income derived from the PRC (including dividends received from the PRC resident enterprises). The aforementioned income tax payable by non-resident enterprises shall be withheld at source, and the payer of the income shall withhold taxes from the payments made to the non-resident enterprise. Such withholding tax may be reduced or exempted under applicable treaties for the avoidance of double taxation.

Under the Arrangement, the Chinese government may levy taxes on dividends paid by a Chinese company to Hong Kong residents (including natural persons and legal entities), provided that the tax levied shall not exceed ten per cent of the total amount of dividends payable by that Chinese company. Where a Hong Kong resident directly holds at least twenty-five per cent of the shares in that Chinese company, the tax levied shall not exceed five per cent of the total amount of dividends. The Fifth Protocol of the Arrangement between the Mainland and the Hong Kong Special Administrative Region for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income (《國家稅務總局關於內地和香港特別行政區關於對所得避免雙重徵稅和防止偷漏稅的安排第五議定書》), promulgated by the State Administration of Taxation and implemented on December 6, 2019, contains provisions regarding the "determination of eligibility for the treatments of the Arrangement". Notwithstanding any other provisions in the Arrangement, where, having regard to all relevant facts and circumstances, it is reasonably considered that the relevant income is one of the principal purposes of the Arrangement or transaction and shall result in any direct or indirect benefit under the Arrangement, the agreed benefits under the determination shall not be granted, unless the granting of such benefits in this case is consistent with the relevant objectives and purposes of the Arrangement. The application of the dividend clauses in tax treaties is subject to the PRC tax laws and regulations, such as the Notice of the State Administration of Taxation on Issues Concerning the Implementation of Dividend Clauses in Tax Treaties (《國家稅務總局關於執行稅收協定股息條款有關問題的通知》).

The Notice on Issues concerning Withholding the Enterprise Income Tax on Dividends Paid by Chinese Resident Enterprises to H Shareholders who are Overseas Non-resident Enterprises (Guo Shui Han [2008] No. 897) (《關於中國居民企業向境外H股非居民企業股東派發股息代扣代繳企業所得稅有關問題的通知》(國稅函[2008]897號)), promulgated and implemented by the State Administration of Taxation on November 6, 2008, further clarified that when a Chinese resident enterprise distributes dividends to H shareholders which are overseas non-resident enterprises for 2008 and subsequent years, enterprise income tax shall be withheld and remitted at the rate of ten per cent.

Tax Treaties

Non-resident investors residing in jurisdictions which have entered into treaties or arrangements for the avoidance of double taxation with the PRC shall be entitled to a reduction of the Chinese enterprise income tax imposed on the dividends received from Chinese companies. The PRC currently has entered into treaties or arrangements for avoidance of double taxation with a number of countries and regions including but not limited to the Hong Kong Special Administrative Region, the Macau Special Administrative Region, Australia, Canada, France, Germany, Japan, Malaysia, the Netherlands, Singapore, the United Kingdom, and the United States. Non-PRC resident enterprises entitled to preferential tax rates in accordance with the relevant taxation treaties or arrangements are required to apply to the PRC tax authorities for a refund of the enterprise income tax in excess of the agreed tax rate, and the refund application is subject to approval by the PRC tax authorities.

TAXATION ON SHARE TRANSFERS

Value Added Tax ("VAT") and Local Surcharges

Pursuant to the Value-Added Tax Law of the PRC (《中華人民共和國增值稅法》) (the "**VAT Law**"), promulgated on December 25, 2024 and implemented on January 1, 2026, the transfer of financial products is subject to the Chinese VAT in the following circumstances: (1) where the financial products are issued within the territory of China; or (2) where the seller is a domestic entity or individual.VAT taxpayers are also required to pay the urban maintenance and construction tax, the education surcharge and the local education surcharge (collectively as "**Local Surcharges**"). These Local Surcharges are calculated based on the actual amount of VAT payable. Where no VAT is payable, no Local Surcharges shall arise.

Income Tax

Individual Investors

Pursuant to the IIT Law, income on the disposal of equity interests in the PRC resident enterprises are subject to individual income tax at the rate of twenty per cent. Pursuant to the Circular on Declaring that Individual Income Tax Continues to be Exempted over Income of Individuals from the Transfer of Shares (Cai Shui Zi [1998] No. 61) (《關於個人轉讓股票所得繼續暫免徵收個人所得稅的通知》(財稅字[1998]61號)) issued by the Ministry of Finance and the State Administration of Taxation on March 30, 1998, from January 1, 1997, income of individuals from transfer of the shares of listed companies continues to be exempted from individual income tax. The Notice on Related Issues Concerning Levying Individual Income Tax over the Income Received by Individuals from the Transfer of Restricted Shares of Listed Companies (Cai Shui [2009] No. 167) (《關於個人轉讓上市公司限售股所得徵收個人所得稅有關問題的通知》(財稅[2009]167號)), jointly issued by the Ministry of Finance, the State Administration of Taxation and the CSRC on December 31, 2009 and implemented on the same date, stipulated that income derived from the transfer of A Shares listed on the Shanghai Stock Exchange and the Shenzhen Stock Exchange shall continue to be temporarily exempted from individual income tax, except for the relevant restricted shares as defined in the Supplementary Notice on Related Issues Concerning Levying Individual Income Tax over the Income Received by Individuals from the Transfer of Restricted Shares of Listed Companies (Cai Shui [2010] No. 70) (《關於個人轉讓上市公司限售股所得徵收個人所得稅有關問題的補充通知》(財稅[2010]70號)) which was jointly issued by the three institutions as aforesaid on November 10, 2010). On December 27, 2024, the State

Administration of Taxation, the Ministry of Finance and the CSRC jointly issued the Announcement on Further Improving Levying, Administration and Service Matters Concerning Individual Income Tax on Income from the Transfer of Restricted Shares of Listed Companies by Individuals (《關於進一步完善個人轉讓上市公司限售股所得個人所得稅有關征管服務事項的公告》), which stipulated that where this announcement conflicts with Cai Shui [2009] No. 167, this announcement shall prevail. As of the Latest Practicable Date, the aforesaid provisions have not expressly provided that individual income tax shall be levied from non-PRC resident individuals on the transfer of shares in the PRC resident enterprises listed on overseas stock exchanges.

Corporate Investors

Pursuant to the Enterprise Income Tax Law (《企業所得稅法》), where a non-resident enterprise does not have an establishment or premise within China, or where the income derived has no actual connection with an establishment or premise in China although such establishment or premise already exists, the enterprise is generally required to pay an enterprise income tax of ten per cent on income sourced from China. Such income tax for non-resident enterprises is subject to withholding at source. On each occasion that a payment is made to a non-resident enterprise, the withholding agent must withhold tax from the payment or amount payable. Such tax may be reduced or exempted under relevant tax treaties or treaties for avoidance of double taxation.

Stamp Duty

Pursuant to the Stamp Tax Law of the PRC (《中華人民共和國印花稅法》), which was issued on June 10, 2021 and came into effect on July 1, 2022, it was stipulated that entities and individuals who conclude taxable documents and engage in securities transactions within the territory of the PRC or conclude taxable documents outside the PRC for use within the PRC shall be taxpayers of stamp tax. Accordingly, the requirements of the stamp duty imposed on the transfer of shares of PRC listed companies shall not apply to the acquisition and disposal of H Shares by non-PRC investors outside of the PRC.

PRINCIPAL TAXATION OF OUR COMPANY IN THE PRC

Enterprise Income Tax

Under the Enterprise Income Tax Law (《企業所得稅法》), resident enterprises shall be subject to enterprise income tax at a rate of twenty-five per cent on their income from sources within and outside the PRC. Foreign-invested enterprises within the PRC that fall within the category of resident enterprises are subject to enterprise income tax at a rate of twenty-five per cent on their income from sources within and outside the PRC. Enterprises established in accordance with the laws of a foreign country (or region) but whose actual administration institutions (referring to the institutions conducting substantive and all-around management and control over the enterprises' production, operation, personnel, accounting matters, finance, etc.) are in the PRC are deemed as resident enterprises and are generally required to enterprise income tax at a rate of twenty-five per cent on their income derived from sources within and outside the PRC. High-tech enterprises that require key support from the state are subject to enterprise income tax at a rate of fifteen per cent.

Value-Added Tax

Pursuant to the Value-Added Tax Law of the PRC (《中華人民共和國增值稅法》), entities and individuals engaged in taxable activities within the PRC (including sales of goods, provision of services, sales of intangible assets, sales of real estate and imports of goods) are subject to VAT.

The current applicable VAT rates are as follows: the rate is thirteen per cent for activities including sales of goods, processing, repair and maintenance services, leasing of tangible chattels, or imports of goods; nine per cent for sales of transport, postal, basic telecommunications, construction and real estate leasing movable properties services, sales of real estate, transfers of land use rights, or sales or imports of specified goods; six per cent for sales of services or intangible assets; and zero tax rate for exports of goods or cross-border sales of services and intangible assets within the scope as prescribed by the State Council.

Foreign Exchange Administration in the PRC

The lawful currency of the PRC is Renminbi. The State Administration of Foreign Exchange under the People's Bank of China (the "**PBOC**") is responsible for administering all matters relating to foreign exchange, including the enforcement of regulations on foreign exchange control.

The Foreign Exchange Administration Regulation 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, implemented on April 1, 1996 and last amended on August 5, 2008, classifies all international receipts, payments and transfers into current items and capital items. Current items are subject to the reasonable examination of the authenticity of transaction documents and the consistency of the foreign exchange receipts and payments by financial institutions engaged in settlement and sales of foreign exchange and supervision and inspection by the foreign exchange administrative authorities. For capital items, overseas institutions and overseas individuals making direct investments in the PRC shall, upon approval by the relevant authorities in charge, complete registration procedures with the foreign exchange administrative authorities. Foreign exchange income received overseas can be repatriated or deposited overseas, and foreign exchange and foreign exchange settlement funds under the capital items are required to be used only for purposes as approved by the competent authorities and foreign exchange administrative authorities.

The Regulations for the Administration of Settlement, Sales and Payment of Foreign Exchange (《結匯、售匯及付匯管理規定》), which was promulgated by the PBOC on June 20, 1996 and implemented on July 1, 1996, removes other restrictions on conversion of foreign exchange under current items, while reserving existing restrictions on foreign exchange transactions under capital items.

Pursuant to the relevant laws and regulations in the PRC, Chinese enterprises (including foreign-invested enterprises) which need foreign exchange for transactions under current items may, without the approval of the foreign exchange administrative authorities, effect payments through foreign exchange accounts opened at the designated foreign exchange banks upon the presentation of valid transaction evidence and documents. Foreign-invested enterprises which need foreign exchange for the distribution of profits to their shareholders and Chinese enterprises which, in accordance with regulations, are required to pay dividends to their shareholders in foreign exchange may, on the strength of resolutions of the Board or the general meeting on the distribution of profits, effect payments from foreign exchange accounts, or effect exchanges and payments at the designated foreign exchange banks.

Pursuant to the Decisions on Matters including Cancelling and Adjusting a Batch of Administrative Approval Items (《國務院關於取消和調整一批行政審批項目等事項的決定》) which was promulgated by the State Council on October 23, 2014, the approval requirement of the State Administration of Foreign Exchange and its branches for the repatriation and settlement of the proceeds raised from the overseas listing into Renminbi domestic accounts has been cancelled.

Pursuant to the Circular of the SAFE on Further Simplifying and Improving Policies for the Foreign Exchange Administration of Direct Investment (《國家外匯管理局關於進一步簡化和改進直接投資外匯管理政策的通知》), which was issued on February 13, 2015 and came into effect on June 1, 2015, the State Administration of Foreign Exchange has abolished the two administrative approval matters concerning the registration and approval of foreign exchange for domestic direct investment and overseas direct investment. Instead, the foreign exchange registration under domestic direct investment and overseas direct investment shall be directly examined and handled by banks. The State Administration of Foreign Exchange and its branch offices shall indirectly regulate the foreign exchange registration of direct investment through banks.

Pursuant to the Circular of the State Administration of Foreign Exchange on Reforming and Standardizing Policies on Administration of Foreign Exchange Settlement of Capital Items (《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》), issued and implemented by the State Administration of Foreign Exchange on June 9, 2016, the relevant policies clearly stipulated that for income from foreign exchange of capital items subject to voluntary foreign exchange settlement (including funds repatriated from overseas listings), domestic institutions may settle the foreign exchange at banks based on their actual operational needs. The proportion of income from foreign exchange of capital items subject to voluntary foreign exchange settlement by domestic institutions is provisionally set at one hundred per cent, and the State Administration of Foreign Exchange may adjust this proportion as appropriate in light of the profile of international receipts and payments.

Pursuant to the Circular on Issues Concerning the Management of Funds for Overseas Listings by Domestic Enterprises (《關於境內企業境外上市資金管理有關問題的通知》), which was promulgated by the PBOC and the State Administration of Foreign Exchange on December 24, 2025 and came into effect from April 1, 2026, when a domestic enterprise is listed overseas, it shall submit the overseas listing registration documents to a bank in its place of registration, open an account for settlement of capital items related to the initial or subsequent issuance and share repurchase, and handle the exchange settlement, transfer and remittance of relevant funds through that designated account. Funds raised by domestic enterprises through overseas listings shall, in principle, be repatriated to the territory of the PRC or deposited overseas in a timely manner, and their uses shall be consistent with the purposes set out in the document or other publicly disclosed documents (such as issuance documents of corporate bonds, board resolutions or resolutions of general meetings). If domestic funds are used for share repurchase, the company shall complete the registration of such changes prior to the proposed buyback.