

## REGULATIONS

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Our global operations subject us to various laws and regulations in the jurisdictions where we operate, particularly those concerning consumer protection, data privacy and protection, import and export, labour practices, anti-money laundering, terrorism financing prevention, economic sanctions, anti-corruption and foreign exchange controls. Below are the laws and regulations in these areas that we believe may materially affect our operations in certain jurisdictions.

Laws and regulations in the jurisdictions where we operate can be complex, sometimes contradictory, and frequently changing. Compliance is costly and often requires changes to our business practices, as well as significant amounts of management time and focus. These laws and regulations may be interpreted and enforced differently in various locations around the world, posing a significant challenge to our global business.

### REGULATIONS RELATED TO CONSUMER PROTECTION

Set forth below are laws and regulations related to consumer protection in the United States and Europe (including the United Kingdom). These jurisdictions are highlighted because the United States and Europe are our largest markets by revenue contributions.

In the United States, we are subject to federal and state laws and regulations regarding consumer protection. The Federal Trade Commission is the principal federal consumer protection regulator and establishes regulations and institutes enforcement proceedings with respect to consumer protection and data privacy, including activities on the internet. At the state level, various state regulatory authorities also oversee similar consumer protection matters. There are also federal and state laws protecting consumer personal data and credit card information.

For example, the Federal Trade Commission Act prohibits unfair and deceptive acts or practices in consumer commercial transactions, such as use of biased algorithms in artificial intelligence, and it is enforced by federal regulators. Non-compliance with the Federal Trade Commission Act can result in injunctions and fines of up to US\$50,120 per violation of a Federal Trade Commission rule (or per day for ongoing violations), which is annually adjusted for inflation (and “violation” is not fully defined and could be interpreted to be as granular as per data field of information collected, so fines can be significant).

US states have adopted analogous state statutes that are enforced by state regulators and private rights of action. The Controlling the Assault of Non-Solicited Pornography and Marketing Act (the “**CAN-SPAM**”), establishes requirements for commercial email messages. The CAN-SPAM, among other things, generally prohibits false or deceptive header information and subject lines, requires that advertisements be identified as such, and requires that consumers be provided means to opt out of receiving future emails. The Federal Trade Commission also requires that businesses maintain certain disclosures if they advertise their products or services, engage in affiliate marketing, post reviews or testimonials, or promote a brand’s products or services via their social media influencer account.

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In the United States, we are subject to regulation by the US Consumer Product Safety Commission (the “CPSC”), under the Consumer Product Safety Act, the Consumer Product Safety Improvement Act, the Federal Hazardous Substances Act, and other laws enforced by the CPSC. These statutes and the related regulations establish safety standards and bans for consumer products. The CPSC monitors compliance of consumer products under its jurisdiction through market surveillance and has the authority to conduct product safety related inspections of establishments where consumer products are manufactured, held, or transported. The CPSC has the authority to require the recall of non-compliant products or products containing a defect that creates a substantial risk of injury to the public. The CPSC may seek penalties for regulatory non-compliance under certain circumstances. In the United States, textile, wool, fur, and leather products, as well as hazardous household products, are also subject to regulatory requirements such as the Fur Products Labeling Act, the Federal Hazardous Substances Act, and the Federal Trade Commission’s guides.

In the EU, we are subject to general consumer protection legislation, including the Consumer Rights Directive and the Consumer Protection Cooperation Regulation as well as the EU Digital Services Act (the “DSA”), which governs platform liability for illegal products, merchant traceability and transparency of recommendation systems, and prohibits manipulative user interfaces. A platform may be directly liable under consumer protection law if it presents products in a way that would lead an average consumer to believe the platform, rather than by a third-party merchant, is the provider, and non-compliance can result in fines of up to 6% of worldwide turnover and compensation claims. We were designated as a Very Large Online Platform (VLOP) under the DSA in April 2024 and have been subject to its the most stringent rules since the end of August 2024. The EU Market Surveillance Regulation also imposes obligations on online marketplaces acting as “fulfilment service provider” to reduce the availability of non-compliant products in the EU. Consumer products in the EU must also comply with the General Product Safety Regulation, which imposes safety, conformity, and post-market surveillance obligations on manufacturers and importers. Retailers who make textile products available within the EU also have to comply with various requirements with respect to the use of textile fibre names as well as labelling and marking of the composition of textile products. In the EU, these aspects are governed by the Regulation (EU) No 1007/2011 of the European Parliament and of the Council of 27 September 2011, which contains rules concerning the use of textile fibre names, the composition of multi-fibres, the content and form of labelling as well as the monitoring of the implementation of the respective requirements including market surveillance checks by the competent authorities.

The United Kingdom also introduced its own mandatory conformity marking requirements under the proposed new UKCA scheme in 2024 (replacing the existing EU CE marking scheme, but which remains valid in the UK), which requires online sellers of certain eligible consumer products to UK consumers to visually display evidence of such requisite marks on physical product and/or packaging and on their online product listings.

In addition, we are subject to the applicable regulations related to consumer protection of other jurisdictions where we operate or sell our products.

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### REGULATIONS RELATED TO DATA PRIVACY AND PROTECTION

Set forth below are laws and regulations related to data privacy and protection in the United States and Europe (including the United Kingdom). These jurisdictions are highlighted because the United States and Europe are our largest markets by revenue contributions.

In the United States, we are subject to federal and state laws and regulations regarding data privacy and protection. For example, the California Consumer Privacy Act of 2018, as amended by the California Privacy Act of 2020 (collectively, the “CCPA”), requires covered businesses to make certain disclosures to consumers about data collection, use and sharing practices, provides consumers with the right to access, delete and opt out of the sale or sharing of their personal data, prohibits covered businesses from discriminating against consumers who exercise any of their rights thereunder, and establishes a new California Privacy Protection Agency to implement and enforce the law. The CCPA also provides a private right of action and statutory damages for certain data breaches that result in the loss of personal data. A growing number of other US states have enacted or proposed similar comprehensive privacy laws. Non-compliance with these laws can result in significant fines and penalties. State laws are changing rapidly, and there is discussion in Congress of new comprehensive federal data protection legislation.

With respect to the use of personal data for direct marketing purposes, the Telephone Consumer Protection Act and the Telemarketing Sales Rule impose significant restrictions on the use of telephone calls and text messages to residential and mobile telephone numbers as a means of communication when prior consent of the person being contacted has not been obtained. In addition, the CAN-SPAM establishes specific requirements for commercial email messages and specifies penalties for the transmission of commercial email messages that are intended to deceive the recipient as to source or content, and obligates, among other things, the sender of commercial emails to provide recipients with the ability to opt out of receiving future commercial emails. Non-compliance with these laws may be enforced by federal regulators or through private litigation, including class actions, and can result in significant penalties.

Under applicable US federal and state laws and regulations addressing privacy and data security, we must provide notice to consumers of our policies with respect to the collection and use of personal data, and our sharing of personal data with third parties, and notice of any changes to our data handling practices. In some instances, we may be obligated to give customers the right to prevent sharing of their personal data with third parties. Under applicable US federal and state laws, we also are required to adhere to a number of requirements when sending commercial email to consumers, including identifying advertising and promotional emails as such, ensuring that subject lines are not deceptive, giving consumers an opportunity to opt-out of further communications and clearly disclosing our name and physical address in each commercial email. Regulation of privacy and data security matters is an evolving area, with new laws and regulations enacted frequently.

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In Europe, we are also subject to laws and regulations regarding data privacy and protection, including the General Data Protection Regulation (the “**EU GDPR**”) and the United Kingdom General Data Protection Regulation and Data Protection Act 2018 (the “**UK GDPR**”). We refer to the EU GDPR and UK GDPR as the GDPR. The GDPR imposes comprehensive data privacy compliance obligations on controllers and processors of personal data, including requirements regarding data processing, data subject rights, cross-border data transfers, data breach notification and accountability. The GDPR restricts the transfer of personal data outside the EEA and the UK to jurisdictions without an adequacy determination, unless appropriate safeguards are in place. Failure to comply with the EU laws, including failure under the GDPR and other laws relating to the security of personal data, may result in fines of up to €20,000,000 (£17,500,000 under the UK GDPR) or up to 4% of the total worldwide annual turnover of the preceding financial year, if greater, and other administrative penalties including regulatory investigations, reputational damage, orders to cease/change our data processing activities, enforcement notices, assessment notices (for a compulsory audit), civil claims (including class actions) and, in certain EU jurisdictions, criminal liability.

We are also subject to evolving privacy laws in Europe on cookies, tracking technologies, online behavioural advertising and e-marketing. Under national or retained laws derived from the ePrivacy Directive, informed consent is required for the placement of a cookie or similar technologies on an individual’s device and for direct electronic marketing.

The GDPR also imposes conditions on obtaining valid consent for cookies, such as a prohibition on pre-checked consents and a requirement to ensure separate consents are sought for each type of cookie or similar technology. Increased regulation of cookies, tracking technologies and online behavioural advertising may lead to broader restrictions and impairments on our online activities including our ability to identify and potentially target users, lead to substantial costs, require significant changes to our systems or infrastructure, negatively impact our ability to understand our customers, and subject us to additional liabilities.

### REGULATIONS RELATED TO IMPORT AND EXPORT

Set forth below are laws and regulations related to import and export in the United States, the EU and the Chinese mainland.

In the United States, where we generated approximately 24% of our revenues in 2025, Section 321 of the Tariff Act of 1930 provides for an administrative exemption from duty and taxes for shipments of merchandise (other than bona-fide gifts and certain personal and household goods) imported by one person on one day having an aggregate fair retail value in the country of shipment of not more than \$800, which previously applied to qualifying imports from China as well as other countries. Since early 2025, President Trump has implemented significant changes to U.S. trade policy with China, including terminating this *de minimis* exemption for imports from China. Shipments under US\$800 from China and delivered to the United States (except for shipments sent through the international postal network which are subject to a specific duty) are no longer entitled to tariff exemptions and are subject to tariffs based on product categories. Shipments from China via the international postal network became subject to a 54% ad valorem tax or, alternatively, a flat fee of US\$100 per postal item. As a result, the *de minimis* exemption is no longer available to products imported to the United

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States from China. On 30 July 2025, President Trump signed another executive order suspending the *de minimis* exemption for imports from all countries (except for shipments sent through the international postal network which are subject to a specific duty), which took effect on 29 August 2025. The suspension was reaffirmed by an executive order signed by President Trump on 20 February 2026, which confirmed its continued effectiveness following the U.S. Supreme Court’s recent ruling on tariffs.

In the EU, Articles 369l to 369x of the VAT System Directive 2006/112/EC contain the Import-One-Stop-Shop (IOSS) regulations applicable throughout the EU. The IOSS VAT system is a special VAT regulation applicable throughout the EU since 1 July 2021 for “distance sales” of goods traded in e-commerce with a real value of up to EUR 150, which are imported from a non-EU country and are sold to non-VAT-registered purchasers (both natural and legal persons). The IOSS regulation applies to the following businesses: (i) online mail order sellers (online distance sellers) sell goods imported from a non-EU country with a real value of up to EUR 150 per consignment to buyers within the EU who are not subject to VAT, and (ii) online marketplaces assist an online distance seller in selling goods imported from outside the EU. In February 2026, the EU formally approved a regulation that terminated this exemption, effective 1 July 2026. Under the new framework, a flat-rate customs duty of EUR 3 is initially levied on each distinct item category contained in consignments valued at or below EUR 150.

In the Chinese mainland, pursuant to the relevant import and export laws and regulations, enterprises in the Chinese mainland engaging in the import or export of goods or technology must complete the record filing and registration formalities with the Ministry of Commerce of China or its designated agency. Unless otherwise provided, the declaration of import or export goods and the payment of duties and related taxes may be made by consignees or consignors or by certain entrusted customs brokers. Customs declaration entities, which are consignees or consignors of imported or exported goods or customs brokers that have filed for record with Chinese mainland customs, may conduct customs declaration business within the customs territory of the Chinese mainland.

### REGULATIONS RELATED TO LABOUR PRACTICES

We have a significant number of employees in the Chinese mainland. Set forth below are laws and regulations related to labour practices in the Chinese mainland.

In the Chinese mainland, the Labour Law of the People’s Republic of China, which was last amended on 29 December 2018, provides that employees are entitled to equal opportunities in employment, selection of occupation, receiving labour remuneration, rest days and holidays, protection of occupational safety and healthcare, social insurance and welfare. Employers must establish and improve a system for occupational safety and healthcare, provide training on occupational safety and healthcare to employees, comply with national and local regulations on occupational safety and healthcare, and provide necessary labour protective supplies to employees.

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The Labour Contract Law of the People’s Republic of China, which was last amended on 28 December 2012, requires every employer to enter into a written contract of employment with each of its employees. The employer may not force its employees to work over 44 hours per week on average and each employer must pay overtime compensation to its employees. The wage of each employee must be no less than the local standard on minimum wages. In accordance with the Labour Contract Law as well as the Interim Provisions on Labour Dispatch, which became effective on 1 March 2014, dispatched workers are entitled to equal pay for equal work as compared to fulltime employees.

Employers are allowed to hire dispatched workers only for temporary, auxiliary or substitute positions, and the number of dispatched workers that an employer is allowed to hire cannot exceed 10% of the total number of employees hired by such employer. In accordance with the Social Insurance Law of the People’s Republic of China, which was last amended on 29 December 2018, employers in the Chinese mainland are required to provide their employees with welfare schemes covering basic pension insurance, basic medical insurance, unemployment insurance, maternity insurance, and occupational injury insurance.

If the employer fails to fully contribute to social insurance funds on time, the collection agency for such social insurance may demand that the employer make full payment or pay the shortfall within a set period and collect a late charge. If the employer fails to pay after the due date, the relevant government administrative body may impose a fine on the employer. In accordance with the Regulation on the Administration of Housing Provident Funds, which was last amended on 24 March 2019, enterprises must register with the competent managing centre for housing funds and contribute to the housing funds for any employee on their payroll. Where an employer fails to pay up housing funds within the prescribed time limit, the employer may be fined and ordered to make payment within a certain period.

Pursuant to the Interpretation II of the Supreme People’s Court on Several Issues Concerning the Application of Law in the Trial of Labour 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)》), or the Interpretation II, which took effect on 1 September 2025, any agreement between an employer and an employee or any commitment made by an employee to the employer stating that social insurance premiums need not be paid shall be deemed invalid by the people’s court. If an employer fails to pay social insurance premiums in accordance with the law, and the employee requests to terminate the labour contract and claims economic compensation pursuant to the Labour Contract Law, the people’s court shall support such claims in accordance with the law. If the employer subsequently pays the social insurance premiums in accordance with the law and requests the employee to return the compensation already paid for the social insurance premiums, the people’s court shall support such requests in accordance with the law. Based on the facts that (i) we have not signed any agreement with our employees or received any commitment from employees to give up the payment of social insurance, and (ii) our employees are entitled to terminate labour contracts and claim economic compensation in accordance with the Labour Contract Law, in lieu of the Interpretation II (which does not impose additional liabilities on the employer), as advised by our PRC Legal Adviser, the Interpretation II does not have a material adverse impact on our business operations or financial position.



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In addition, we are subject to the applicable regulations related to labour practices of other jurisdictions where we operate or sell our products, such as the EU, the UK, Singapore and the United States.

### **REGULATIONS RELATED TO ANTI-MONEY LAUNDERING, PREVENTION OF TERRORISM FINANCING, ECONOMIC SANCTIONS AND ANTI-CORRUPTION**

Set forth below are laws and regulations related to anti-money laundering, prevention of terrorism financing, economic sanctions and anti-corruption in the United States, Europe (including the United Kingdom) and Singapore. These jurisdictions are highlighted because the United States and Europe are our largest markets by revenue contributions and Singapore is one of the jurisdictions where we conduct operations.

In the United States, economic sanctions administered by the U.S. Treasury Department’s Office of Foreign Assets Control (“**OFAC**”) restrict trade with or investment in designated countries, and generally prohibit transfers of blocked assets without an OFAC license. Failure to comply with these sanctions could result in civil money penalties and other legal, strategic and reputational consequences. In addition, the U.S. Foreign Corrupt Practices Act of 1977 (the “**FCPA**”) prohibits corrupt payments to foreign government officials and, for issuers whose securities are listed in the United States requires the maintenance of accurate books and records and adequate internal accounting controls. Violations of the FCPA, even if occurring wholly outside the United States, can result in criminal and civil fines, imprisonment, disgorgement, oversight and debarment from government contracts.

In Europe, the EU imposes restrictive measures, or sanctions, targeting governments, entities and individuals in furtherance of its Common Foreign and Security Policy typically consisting of asset freezes and travel bans. In the EU, anti-money laundering and terrorist financing rules are generally based on the EU’s Fourth Money Laundering Directive (Directive EU 2015/849), Fifth Money Laundering Directive (Directive EU 2018/843) and Financial Action Task Force Recommendations, which require reporting entity to apply a risk-based approach, conduct customer due diligence and report suspicious transactions to the relevant authorities. Separately, the UK Bribery Act 2010 prohibits UK individuals from offering, promising or providing improper payments or other benefits to government officials or other persons to obtain or retain business, extends to commercial bribery in the private sector, and can impose liability on a company for failing to prevent bribery by an associated person.

In Singapore, the primary anti-money laundering legislation is the Corruption, Drug Trafficking and Other Serious Crimes (Confiscation of Benefits) Act 1992 (the “**CDSA**”) and the primary terrorist financing legislation is the Terrorism (Suppression of Financing) Act 2002 (the “**TSOFA**”). The CDSA criminalises the acquisition, possession, use, concealment or transfer of benefits derived from criminal conduct, while the TSOFA implements the International Convention for the Suppression of the Financing of Terrorism.

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In addition, we are subject to the applicable regulations related to anti-money laundering, prevention of terrorism financing, economic sanctions and anti-corruption of other jurisdictions where we operate or sell our products.

### REGULATIONS RELATED TO FOREIGN EXCHANGE CONTROLS

Set forth below are laws and regulations related to foreign exchange controls in the Chinese mainland.

In the Chinese mainland, in accordance with the Regulations of the People’s Republic of China on Foreign Exchange Administration last amended by the State Council on 5 August 2008, as modified by the Notice of the State Administration of Foreign Exchange on Further Simplifying and Improving Policies for the Foreign Exchange Administration of Direct Investment on 13 February 2015, the RMB is freely convertible into other currencies for current account items, including trade and service-related foreign exchange transactions, but it is not freely convertible for capital account items, such as direct investments, unless with prior approval from and registration with the State Administration of Foreign Exchange or its local branch.

Pursuant to the Notice of State Administration of Foreign Exchange on Reforming the Mode of Management of Settlement of Foreign Exchange Capital of Foreign-Invested Enterprises, which was promulgated on 30 March 2015, banks are allowed to directly handle the settlement of foreign exchange capital in the capital accounts of foreign-invested enterprises in the Chinese mainland based on the enterprises’ actual requirements for business operation. RMB funds obtained from the settlement of foreign exchange capital of foreign-invested enterprises in the Chinese mainland should be deposited into and managed under the account for settled foreign exchange to be paid.

### REGULATIONS RELATED TO PERMISSIONS FOR OUR [REDACTED]

On 17 February 2023, the China Securities Regulatory Commission (the “CSRC”) released several regulations regarding the filing requirements for overseas offerings and listings, including the Trial Administrative Measures of Overseas Securities Offering and Listing by Domestic Companies and five supporting guidelines. We refer to these collectively as the “Overseas Listing Filing Rules”. The Overseas Listing Filing Rules became effective on 31 March 2023. According to the Overseas Listing Filing Rules, a direct or indirect overseas [REDACTED] and [REDACTED] by a company subject to the Overseas Listing Filing Rules must be filed with the CSRC. We filed with the CSRC in relation to the [REDACTED] pursuant to the Overseas Listing Filing Rules, and the CSRC issued a notification regarding our completion of the filing procedures for the [REDACTED] of our Class B Shares on the Stock Exchange and the [REDACTED] on 10 July 2026.



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### REGULATIONS RELATED TO ESG

We are subject to evolving regulations related to environmental and sustainability matters across the jurisdictions in which we operate. For example, we are subject to regulations in a growing number of jurisdictions, including across the EU, that impose Extended Producer Responsibility (EPR) fees for products sold into the market. Furthermore, regulations related to environmental and sustainability matters are developing. For example, the Corporate Sustainability Due Diligence Directive (the “**CSDDD**”), which entered into force in July 2024 and was later amended by the Omnibus I simplification package in February 2026, requires EU member states to transpose the CSDDD into their national laws and introduces new due diligence, stakeholder engagement, monitoring and disclosure obligations. The extent to which we might need to review and/or revise the actions that we already take in these areas may depend on the precise terms of the member state national laws which are to be enacted, and so remain, at present, slightly unclear.

Furthermore, the Ecodesign for Sustainable Products Regulation (the “**ESPR**”), a framework regulation that entered into force in July 2024, introduces various obligations, including eco-design requirements, a Digital Product Passport, a digital record that provides life cycle data for each product in a standardised format, and a ban on the destruction of certain unsold consumer products. Disclosure obligations under the ESPR already apply to “large companies”, requiring them to report information on the unsold consumer products they discard. Specific requirements under the ESPR will be set out in further delegated legislation. In February 2026, the European Commission adopted a Delegated Act and an accompanying Implementing Act under the ESPR, which outlines circumstances under which the destruction of certain types of unsold consumer product may be permitted and introduces a standardised format for businesses to disclose the volumes of unsold consumer products they discard, applicable from February 2027. The ban on destroying unsold apparel, clothing accessories, and footwear, along with the associated derogations under the ESPR, will apply to large companies starting in July 2026. Certain of our EU entities qualify as “large enterprises” for the purposes of the ESPR, and we are accordingly subject to the ban starting July 2026.

The EU Corporate Sustainability Reporting Directive (the “**CSRD**”), which entered into force in January 2023, requires qualifying companies to report detailed sustainability information in accordance with the recently revised European Sustainability Reporting Standards (the “**ESRS**”). The CSRD was amended by the Omnibus I simplification package in February 2026, which, among other things, raised the thresholds for in-scope companies and introduced a phased timeline for certain reporting obligations, including voluntary standards and a transitional period for value chain reporting. In addition, the ESRS underwent a significant simplification process as part of the Omnibus I simplification package, with revised ESRS adopted by the European Commission in July 2026. The new ESRS still need to be considered by the European Parliament and Council of Ministers before a delegated act confirming their scope and content can be introduced. The extent to which our EU entities may be subject to CSRD reporting obligations, and the precise scope of the applicable ESRS requirements, will depend on the final transposition of the directive and any further simplification measures by the European Parliament, Council and/or EU member states. Failure to comply with CSRD requirements may result in penalties determined at the national level by EU member states.

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In addition, the EU Empowering Consumers for the Green Transition Directive (the “**Empowering Consumers Directive**”), which entered into force in March 2024 and must be applied by EU member states from 27 September 2026, seeks to strengthen the EU rules against misleading environmental claims and other unfair commercial practices. Among other things, the Empowering Consumers Directive prohibits the use of generic environmental claims, such as “eco-friendly” or “climate neutral”, unless supported by recognised certification schemes or verifiable commitments. EU member states were required to transpose the directive into national law by March 2026, and national implementing measures are being adopted across the EU. The Empowering Consumers Directive may require us to review and adjust our consumer-facing sustainability-related communications and marketing practices to ensure compliance.

In June 2025, the French Senate passed a bill aimed at reducing the environmental impact of the textile industry. Following a compromise reached by a joint committee of the French National Assembly and the French Senate on 17 June 2026, the bill was definitively adopted by the French Parliament on 29 June 2026. Among other things, the bill proposes to impose an environmental surcharge on products sold by platforms qualifying as “ultra-fast-fashion” operators, which may reach up to EUR 20 per item by 2030, subject to a cap of 50% of the product’s pre-tax price, and to prohibit paid advertising and promotional activities by social media influencers on behalf of brands or products sold through platforms designated as “ultra-fast-fashion” operators. The bill was promulgated by the President of the French Republic and subsequently published in the Official Journal on 9 July 2026. The law, as well as the various implementing decrees that will set out the necessary detail of the law may be challenged in the French Constitutional Council and/or before the European Commission, which could delay or affect the final form and/or impact of the legislation.