

REGULATORY OVERVIEW

The following section sets forth the principal laws, regulations, rules and policies that materially affect our business operations in the People’s Republic of China (the “**PRC**”). The information contained herein does not purport to be a comprehensive summary of all laws and regulations applicable to us.

REGULATIONS RELATING TO COMPANIES AND FOREIGN INVESTMENT

All companies established within the PRC are subject to the PRC Company Law (《中華人民共和國公司法》), which was promulgated by the Standing Committee of the National People’s Congress (the “**SCNPC**”) on December 29, 1993, became effective on July 1, 1994, and was last amended on December 29, 2023 with effect from July 1, 2024. Under the PRC Company Law, companies are principally classified into limited liability companies and joint stock limited companies, both of which possess legal person status, and the liabilities of their shareholders are generally limited to the amount of capital contributions made by such shareholders. The PRC Company Law provides for the establishment, corporate structure and corporate management of companies, which also applies to foreign-invested enterprises in the PRC. Unless otherwise provided in the PRC foreign investment laws, the provisions in the PRC Company Law shall prevail.

On March 15, 2019, the National People’s Congress promulgated the PRC Foreign Investment Law (《中華人民共和國外商投資法》) (the “**Foreign Investment Law**”), which became effective on January 1, 2020 and replaced three existing laws on foreign investments in the PRC, namely, the PRC Equity Joint Venture Law (《中華人民共和國中外合資經營企業法》), the PRC Cooperative Joint Venture Law (《中華人民共和國中外合作經營企業法》) and the Law of the PRC on Wholly Foreign-owned Enterprises (《中華人民共和國外資企業法》). On December 26, 2019, the State Council issued the Regulations on Implementing the Foreign Investment Law of the PRC (《中華人民共和國外商投資法實施條例》), which came into effect on January 1, 2020 and replaced the Regulations on Implementing the Sino-Foreign Equity Joint Venture Enterprise Law (《中華人民共和國中外合資經營企業法實施條例》), Provisional Regulations on the Duration of Sino-Foreign Equity Joint Venture Enterprise Law (《中外合資經營企業合營期限暫行規定》), the Regulations on Implementing the Wholly Foreign-Owned Enterprise Law (《中華人民共和國外資企業法實施細則》) and the Regulations on Implementing the Sino-Foreign Cooperative Joint Venture Enterprise Law (《中華人民共和國中外合作經營企業法實施細則》). “Foreign investment” refers to investment activities conducted directly or indirectly within the PRC by foreign natural persons, enterprises or other organizations. On December 30, 2019, the Ministry of Commerce of the PRC (the “**MOFCOM**”) and the State Administration for Market Regulation (the “**SAMR**”) jointly promulgated the Measures on Reporting of Foreign Investment Information (《外商投資信息報告辦法》), which became effective on January 1, 2020. Pursuant thereto, foreign investors are required to submit investment information to the competent commerce authorities through the enterprise registration system and the National Enterprise Credit Information Publicity System in connection with the establishment of foreign-invested enterprises, the establishment of foreign-invested enterprises through the acquisition of equity interests in non-foreign-invested enterprises, and subsequent changes thereto.

Pursuant to the Foreign Investment Law, the PRC has adopted a national treatment regime, including a negative list approach to the administration of foreign investment. The negative list is promulgated, amended or published from time to time upon approval by the State Council, and specifies industries in which foreign investment is prohibited or restricted. Foreign investors are prohibited from investing in prohibited industries, and foreign investment in restricted industries must comply with certain conditions set out in the negative list. Except for industries classified as prohibited or restricted under the negative list, foreign investment is treated on an equal footing with domestic investment.

The Special Administrative Measures (Negative List) for Foreign Investment Access (2024 Edition) (《外商投資准入特別管理措施(負面清單)(2024年版)》) (the “**Negative List**”), promulgated by the National Development and Reform Commission (the “**NDRC**”) and MOFCOM

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on September 6, 2024 and effective on November 1, 2024, and the Catalog of Industries Encouraged for Foreign Investment (2025 Edition) (《鼓勵外商投資產業目錄(2025年版)》) (the “**Encouraged Catalog**”), promulgated by the NDRC and MOFCOM on December 15, 2025 and effective on February 1, 2026, replaced the previous negative list, including the Special Administrative Measures (Negative List) for Foreign Investment Access (2021 Edition), and the previous encouraged catalog, and set forth encouraged, restricted and prohibited industry categories. Any industry not included in the Negative List is open to foreign investment and subject to administration based on the principle of equal treatment for domestic and foreign investment. Based on the Negative List and the Encouraged Catalog, as of the Latest Practicable Date, our business does not fall within the scope of the Negative List and is not subject to special administrative measures.

REGULATIONS RELATING TO MARINE ENVIRONMENTAL PROTECTION

Pursuant to the Marine Environment Protection Law of the PRC (《中華人民共和國海洋環境保護法》), which was promulgated on August 23, 1982, most recently amended on October 24, 2023 and became effective on January 1, 2024 by the SCNPC, no vessel or related operations may discharge pollutants, wastes, ballast water, ship garbage or other harmful substances into sea areas under the jurisdiction of the PRC in violation of the provisions thereof. All vessels shall be equipped with sufficient anti-pollution systems and equipment.

Pursuant to the Law of the PRC on the Prevention and Control of Atmospheric Pollution (《中華人民共和國大氣污染防治法》), which was promulgated on September 5, 1987 and most recently amended and implemented by the SCNPC on October 26, 2018, ship inspection authorities are required to conduct emission inspections on ship engines and relevant equipment. Only vessels that meet national emission standards after inspection may engage in operation. International shipping vessels are required, upon berthing, to use marine fuels that comply with atmospheric pollutant control requirements.

Pursuant to the Regulations on the Administration of the Prevention and Control of Marine Environmental Pollution by Ships (《防治船舶污染海洋環境管理條例》), which were promulgated on September 9, 2009 and most recently amended and implemented by the State Council on March 19, 2018, and the Administrative Provisions on the Prevention and Control of Marine Environmental Pollution by Ships and Their Relevant Operational Activities (《中華人民共和國船舶及其有關作業活動污染海洋環境防治管理規定》), which were most recently amended and implemented by the Ministry of Transport on May 23, 2017, the structure, facilities and equipment of vessels shall comply with relevant national ship inspection rules relating to the prevention and control of marine environmental pollution, meet the requirements of international conventions to which the PRC is a contracting party or a party thereto, and obtain the relevant certificates in accordance with applicable regulations. Vessels shall, in accordance with laws, administrative regulations, requirements of the competent transportation authorities under the State Council, and international conventions concluded or acceded to by the PRC, obtain and carry on board the relevant certificates and documents for the prevention and control of marine environmental pollution.

At the 70th session of the Marine Environment Protection Committee of the International Maritime Organization, the International Maritime Organization adopted a resolution confirming January 1, 2020 as the implementation date for the significant reduction in sulfur content of marine fuel oils, and implementing a global sulfur content cap of 0.50% m/m (mass by mass). In order to effectively implement the global marine fuel sulfur content limit, the China Maritime Safety Administration promulgated the Implementation Plan for the Global Sulfur Cap for Marine Fuels in 2020 (《2020年全球船用燃油限硫令實施方案》) on October 23, 2019 (the “**2020 Implementation Plan**”), which, among others, expressly provides that international voyaging vessels (i) shall not, from January 1, 2020, use fuel oils with a sulfur content exceeding 0.5% m/m in waters under the jurisdiction of the PRC; (ii) shall not, from January 1, 2020, use fuel oils with a sulfur content exceeding 0.1% m/m when entering emission control areas for atmospheric

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pollutants of inland river vessels in the PRC (expanded to the emission control areas for atmospheric pollutants of vessels in the Hainan waters from January 1, 2022); and (iii) shall not, from March 1, 2020, carry self-use fuel oils with a sulfur content exceeding 0.5% m/m when entering waters under the jurisdiction of the PRC. The 2020 Implementation Plan further provides that vessels using any devices, equipment or alternative fuels that achieve the same or better effects in reducing air pollution may be exempted from the above requirements.

Pursuant to the Law of the PRC on the Prevention and Control of Environmental Pollution by Solid Waste (《中華人民共和國固體廢物污染環境防治法》), which was promulgated by the SCNPC in 1995 and most recently amended on April 29, 2020, the PRC encourages and supports scientific research, technology development, the promotion of advanced technologies and public education relating to the prevention and control of environmental pollution by solid waste.

REGULATIONS RELATING TO CUSTOMS DECLARATION

The Customs Law of the PRC (《中華人民共和國海關法》), which was promulgated by the SCNPC on January 22, 1987, became effective on July 1, 1987, and was most recently amended on April 29, 2021, provides that the PRC Customs is the governmental authority responsible for supervising and controlling all conveyances, goods and articles entering into or leaving the customs territory of the PRC. All conveyances, goods and articles must enter or leave the PRC through customs offices established by the state. Consignees or consignors of import and export goods, or customs declaration enterprises entrusted by such consignees or consignors, may handle customs declaration and tax payment procedures. Consignees or consignors of import and export goods and customs declaration enterprises are required to complete record-filing with the customs authorities when handling customs declaration procedures, failing which they may be subject to fines imposed by the customs authorities.

Pursuant to the Administrative Measures of the PRC on the Record-Filing of Customs Declaration Entities (《中華人民共和國海關報關單位備案管理規定》), promulgated by the General Administration of Customs of the PRC (the “GAC”) on November 19, 2021 and effective on January 1, 2022, consignees or consignors of import and export goods and customs declaration enterprises applying for customs record-filing are required to have market entity qualification; among them, consignees or consignors of import and export goods applying for customs record-filing are also required to have completed the record-filing as foreign trade operators. Pursuant to the Announcement on Fully Incorporating Customs Declaration Entity Record-Filing into the “Multiple Certificates in One” Reform jointly issued by the GAC and the SAMR on December 20, 2021 and effective from January 1, 2022, customs declaration entity record-filing has been incorporated into the market entity registration process. Relevant applicants are no longer required to separately submit applications to the customs authorities for customs declaration entity record-filing.

In addition, the SCNPC promulgated the Decision of the SCNPC on Amending the Foreign Trade Law of the PRC (《中華人民共和國對外貿易法》) on December 30, 2022, which removed the requirement for foreign trade operators engaged in the import and export of goods or technologies to complete registration with the competent foreign trade administrative department of the State Council or any institution entrusted thereby, namely, the foreign trade operator record-filing requirement. The foregoing amendment has been retained in the latest version of the Foreign Trade Law of the PRC, which was promulgated on December 27, 2025 and came into effect on March 1, 2026.

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REGULATIONS RELATING TO SAFETY, QUALITY AND ENVIRONMENTAL PROTECTION

Work Safety

The primary law governing work safety is the Work Safety Law of the PRC (《中華人民共和國安全生產法》) (the “**Work Safety Law**”), which was promulgated by the SCNPC on June 29, 2002, became effective on November 1, 2002, and was most recently amended on June 10, 2021 with effect from September 1, 2021. Pursuant to the Work Safety Law, production and business operation entities must comply with the Work Safety Law and other relevant laws and regulations, establish and improve internal rules and regulations on work safety, increase safeguards for investment in work safety funds, materials, technology and personnel, strengthen the standardization and informatization of work safety, and establish mechanisms for risk prevention, control and mitigation.

Pursuant to the Regulations on Work Safety Management of Construction Projects (《建設工程安全生產管理條例》), which were promulgated by the State Council on November 24, 2003 and became effective on February 1, 2004, entities involved in construction projects shall establish and implement safety production responsibilities and comply with the relevant safety management requirements for construction activities.

Pursuant to the Measures for the Supervision and Administration of Safety Facilities “Three Simultaneities” Requirements for Construction Projects (《建設項目安全設施“三同時”監督管理辦法》), which were promulgated by the former State Administration of Work Safety on December 14, 2010, became effective on February 1, 2011, and were amended on April 2, 2015, safety facilities of construction projects shall be designed, constructed and put into use simultaneously with the main project, and relevant review, inspection and acceptance procedures shall be conducted as required.

Pursuant to the Measures for the Supervision and Administration of the Three Simultaneity Requirements for Prevention Facilities of Occupational Diseases in Construction (《建設項目職業病防護設施“三同時”監督管理辦法》), which were promulgated by the former State Administration of Work Safety on March 9, 2017 and became effective on May 1, 2017, construction projects that may cause occupational disease hazards shall, as required, fulfill the procedures of occupational disease hazard pre-assessment, protective facilities design review and protective facilities completion acceptance.

Pursuant to the Special Equipment Safety Law of the PRC (《中華人民共和國特種設備安全法》), which was adopted by the SCNPC on June 29, 2013 and became effective on January 1, 2014, users of special equipment are required to complete registration with the competent authorities prior to putting such special equipment into use or within 30 days after it is put into use, and obtain the relevant use registration certificates. Where a user of special equipment uses special equipment without completing the use registration in accordance with the law, the competent authorities may order such user to rectify and fulfill the registration within a prescribed time limit; if the rectification is not completed within such time limit, the user may be ordered to cease the use of the relevant special equipment and be subject to a fine ranging from RMB10,000 to RMB100,000.

Fire Safety

Pursuant to the Fire Protection Law of the PRC (《中華人民共和國消防法》), which was promulgated on April 29, 1998, became effective on September 1, 1998, and was most recently amended on April 29, 2021 with effect on the same day, construction projects which are required by the competent authorities to apply for fire protection acceptance but fail to undergo or pass such acceptance shall be prohibited from being put into use. Other construction projects shall also be subject to random inspections by the competent authorities after acceptance, and those that fail such inspections shall cease operation.

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Product Quality

Pursuant to the Product Quality Law of the PRC (《中華人民共和國產品質量法》), which was promulgated on February 22, 1993, became effective on September 1, 1993, and was most recently amended on December 29, 2018 with effect on the same day, all producers and sellers engaging in production and sales activities in the PRC are required to establish and improve internal product quality management systems and strictly implement post-specific quality standards, quality responsibilities and corresponding assessment mechanisms. Any producer or seller that violates the foregoing responsibilities and obligations and causes losses to consumers or personal injury or property damage shall bear compensation liabilities. Competent authorities may impose administrative penalties for any illegal acts, including ordering cessation of production or sales, confiscation of illegally produced or sold products, imposition of fines, confiscation of illegal gains, among others; in serious cases, business licenses may be revoked; where a crime is constituted, criminal liability shall be pursued in accordance with the law.

Environmental Protection

The Environmental Protection Law of the PRC (《中華人民共和國環境保護法》), which was promulgated by the SCNPC on December 26, 1989 and became effective on the same day, most recently amended on April 24, 2014 and effective on January 1, 2015, is the fundamental law governing environmental regulation in the PRC. It requires enterprises to assume primary responsibility for pollution prevention and control, including strict compliance throughout the entire construction and operation process with requirements relating to environmental impact assessment, pollutant discharge permitting, and compliance with pollutant emission standards, and to ensure that environmental protection facilities are designed, constructed and put into operation simultaneously with the principal construction projects.

The Environmental Impact Assessment Law of the PRC (《中華人民共和國環境影響評價法》), which was promulgated by the SCNPC on October 28, 2002, became effective on September 1, 2003, and was most recently amended on December 29, 2018 with effect on the same day, provides that project owners shall, depending on the extent of the environmental impact of construction projects, organize the preparation of environmental impact reports, environmental impact report forms, or complete environmental impact registration forms, as applicable. Pursuant to the Regulations on the Administration of Environmental Protection of Construction Projects (《建設項目環境保護管理條例》), which were promulgated by the State Council on November 29, 1998 and became effective on the same day, and most recently amended on July 16, 2017 with effect from October 1, 2017, upon completion of construction projects that are required to prepare environmental impact reports or environmental impact report forms, project owners shall conduct acceptance inspections of the ancillary environmental protection facilities and prepare acceptance reports in accordance with the standards and procedures prescribed by the competent environmental protection authorities under the State Council.

Pollutant Discharge Permitting

The Regulations on Pollutant Discharge Permits (《排污許可管理條例》), which were promulgated by the State Council on January 24, 2021 and became effective on March 1, 2021, and the Measures for the Administration of Pollutant Discharge Permits (《排污許可管理辦法》), which were promulgated by the Ministry of Ecology and Environment on April 1, 2024 and became effective on July 1, 2024, replaced the Measures for the Administration of Pollutant Discharge Permits (Trial) (《排污許可管理辦法(試行)》) and further strengthened the regulatory framework. Enterprises, public institutions and other production and business operators that are included in the classified management catalog for pollutant discharge permits for stationary pollution sources (collectively, “**Pollutant Discharge Entities**”) are required to apply for and obtain pollutant discharge permits within the prescribed time limits; those not included in the catalog are temporarily not required to apply for pollutant discharge permits. Where any pollutant discharge entities discharges pollutants without having obtained a pollutant discharge permit, the competent ecological and environmental authority shall order rectification or impose measures such as

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restricting production or suspending operations for rectification, and may impose a fine ranging from RMB200,000 to RMB1,000,000; where the circumstances are serious, such authority may, upon approval by the people’s government with the requisite approval authority, order suspension of business or closure.

Pursuant to the Regulations on the Administration of Urban Drainage and Sewage Treatment (《城鎮排水與污水處理條例》), which were promulgated by the State Council on October 2, 2013 and became effective on January 1, 2014, enterprises, public institutions and individual industrial and commercial households engaging in industrial, construction, catering, medical and other activities (collectively, “Drainage Entities”) are required to apply to the competent urban drainage authorities for a permit for discharging wastewater into urban drainage facilities. Where any Drainage Entity discharges wastewater into urban drainage facilities in violation of the foregoing requirements, the competent urban drainage authorities may order it to cease the illegal conduct, rectify within a prescribed time limit and complete the relevant formalities for obtaining a permit for discharging wastewater into drainage pipelines, and may impose a fine of up to RMB500,000. Where losses are caused, civil liabilities for compensation shall be borne in accordance with the law; where a crime is constituted, criminal liabilities shall be pursued in accordance with the law.

REGULATIONS RELATING TO SHIP REGISTRATION

Pursuant to the Regulations on Ship Registration of the PRC (《中華人民共和國船舶登記條例》), which were promulgated on June 2, 1994 and last amended and implemented by the State Council on July 29, 2014, vessels owned by enterprise legal persons established in accordance with the laws of the PRC and having their principal place of business within the territory of the PRC are required to be registered. Only vessels that have been duly registered and obtained the nationality of the PRC may sail under the national flag of the PRC; unregistered vessels are not permitted to sail under the national flag of the PRC. The creation, transfer and extinguishment of ship mortgages and bareboat charter rights shall be registered with the ship registration authorities, and any such rights that are not registered shall not be enforceable against bona fide third parties.

REGULATIONS RELATING TO LEASED PROPERTIES AND CONSTRUCTION PROJECTS

Project Filing

Pursuant to the Measures for the Administration of Approval and Filing of Enterprise Investment Projects (《企業投資項目核准和備案管理辦法》) promulgated by the NDRC on March 8, 2017 and effective on April 8, 2017, which were most recently amended on March 23, 2023 with effect from May 1, 2023, enterprise investment projects (refer to fixed assets investment projects invested and constructed by enterprises within the territory of China) related to national security, layout of major production capacity across the country, strategic resources development and major public interests, etc. are subject to approval management. Other projects are subject to filing management. Unless otherwise stipulated by the State Council, projects subject to filing management shall be filed according to the principle of territorial jurisdiction. Provincial governments shall be responsible for formulating measures for the administration of project filing within their respective administrative regions, specifying the filing authorities and their respective jurisdictions.

In addition, pursuant to the Regulation on the Administration of Approval and Filing of Enterprise Investment Projects (《企業投資項目核准和備案管理條例》), which was promulgated by the State Council on November 30, 2016 and became effective on February 1, 2017, enterprise investment projects shall, depending on their category, be subject to either approval or filing, and shall be handled through the competent investment authorities in accordance with the Regulation.

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Land Use and Leased Properties

Pursuant to the Construction Law of the PRC (《中華人民共和國建築法》), which was promulgated by the SCNPC on November 1, 1997, became effective on March 1, 1998, and was most recently amended on April 23, 2019 with effect on the same day, and the Measures for the Administration of Construction Project Commencement Permits (《建築工程施工許可管理辦法》), which were promulgated on June 25, 2014, became effective on October 25, 2014, and were most recently amended on March 30, 2021 with effect on the same day, prior to commencement of construction projects, project owners shall apply for construction permits with the competent construction administrative departments of the people’s governments at or above the county level where the projects are located, except for small projects below the threshold determined by the competent construction administrative department of the State Council. For construction projects for which commencement reports have been approved in accordance with the authority and procedures prescribed by the State Council, construction permits are no longer required.

Pursuant to the Urban Real Estate Administration Law of the PRC (《中華人民共和國城市房地產管理法》), which was promulgated by the SCNPC on July 5, 1994, became effective on January 1, 1995, and was most recently amended on August 26, 2019, with effect from January 1, 2020, leases of houses and premises within urban planning areas are subject to relevant administration requirements, and the parties shall handle the relevant registration and filing procedures with the competent authorities as required.

Pursuant to the Measures for the Administration of the Leasing of Commodity Buildings (《商品房屋租賃管理辦法》), which were promulgated on December 1, 2010 and became effective on February 1, 2011, within 30 days after the conclusion of a housing lease contract, the parties to such lease shall complete registration and filing procedures with the competent construction (real estate) administrative departments of the people’s governments at the municipal, city or county level where the leased premises are located. Where the relevant registration and filing procedures are not completed, the parties to the lease agreement may be fined from RMB1,000 to RMB10,000.

REGULATIONS RELATING TO INTELLECTUAL PROPERTY

Trademarks

Pursuant to the PRC Trademark Law (《中華人民共和國商標法》), which was promulgated on August 23, 1982 and became effective on March 1, 1983, and was most recently amended on April 23, 2019 with effect from November 1, 2019, and the Implementing Regulations of the PRC Trademark Law (《中華人民共和國商標法實施條例》), which were promulgated on August 3, 2002 and became effective on September 15, 2002, and were most recently amended on April 29, 2014 with effect from May 1, 2014, the Trademark Office of China National Intellectual Property Administration is responsible for trademark registration and administration in the PRC.

Domain Names

Pursuant to the Measures for the Administration of Internet Domain Names (《互聯網域名管理辦法》), which were promulgated on August 24, 2017 and became effective on November 1, 2017, the Ministry of Industry and Information Technology (“MIIT”) is responsible for the administration of internet domain names in the PRC. Domain name registration services generally follow the principle of “first application, first registration.” Domain name registration service institutions providing domain name registration services shall require domain name applicants to provide true, accurate and complete identity information of the domain name holders and other domain name registration information, and enter into registration agreements. Upon completion of the registration procedures, the applicant becomes the holder of the relevant domain name.

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Patents

Pursuant to the PRC Patent Law (《中華人民共和國專利法》), which was promulgated by the SCNPC on March 12, 1984 and became effective on April 1, 1985, and was most recently amended on October 17, 2020 with effect from June 1, 2021, and the Detailed Rules for the Implementation of the Patent Law of the PRC (2023 Revision) (《中華人民共和國專利法實施細則(2023年修訂)》), which were promulgated on December 21, 1992 and became effective on January 1, 1993, and were most recently amended on December 11, 2023 with effect from January 20, 2024, the China National Intellectual Property Administration is responsible for the administration of patent matters in the PRC. The departments responsible for patent administration under the people’s governments of provinces, autonomous regions or municipalities directly under the central government are responsible for patent agency administration within their respective administrative regions. The PRC Patent Law and its implementing rules provide for three types of patents, namely invention patents, utility model patents and design patents. The PRC patent system adopts the “first-to-file” principle. The term of protection for invention patents is 20 years, and the terms of protection for utility model patents and design patents are 10 years. Without obtaining permission or proper authorization from the patentee, any use of a patented invention shall constitute patent infringement.

Computer Software Copyrights

The Measures for the Registration of Computer Software Copyright (《計算機軟件著作權登記辦法》), which were promulgated by the National Copyright Administration on February 20, 2002 and became effective on the same day, govern the registration of software copyrights as well as the registration of exclusive software copyright license agreements and transfer agreements. The National Copyright Administration is responsible for the administration of software copyright registration nationwide and has designated the Copyright Protection Center of China as the software registration authority. The Copyright Protection Center of China issues registration certificates to applicants for computer software copyrights.

REGULATIONS RELATING TO LABOR PROTECTION

Pursuant to the Labor Law of the PRC (《中華人民共和國勞動法》), which was promulgated on July 5, 1994 and became effective on January 1, 1995, and was most recently amended on December 29, 2018 with effect on the same day, employers are required to establish and improve internal rules and regulations in accordance with the law, safeguard employees’ labor rights, and ensure the fulfillment of employees’ labor obligations.

The Labor Contract Law of the PRC (《中華人民共和國勞動合同法》), which was promulgated on June 29, 2007 and became effective on January 1, 2008, and was most recently amended on December 28, 2012 with effect from July 1, 2013, together with the Implementing Regulations of the Labor Contract Law of the PRC (《中華人民共和國勞動合同法實施條例》), which were promulgated on September 18, 2008 and became effective on the same day, provide that an employer shall enter into a written labor contract with an employee when establishing a labor relationship. Employers are prohibited from compelling employees to work beyond statutory working hours, and are required to pay overtime wages in accordance with state regulations. Wages paid to employees shall not be lower than the local minimum wage standards and shall be paid to employees in a timely manner. Employers may terminate labor contracts and dismiss employees in accordance with the law upon mutual agreement with employees or under other circumstances that satisfy statutory conditions.

Pursuant to the Interim Provisions on Labor Dispatch (《勞務派遣暫行規定》), which were promulgated on January 24, 2014 and became effective on March 1, 2014, employers may only use dispatched workers in temporary, auxiliary or substitute positions and are required to strictly control the number of dispatched workers used.

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Pursuant to the Social Insurance Law of the PRC (《中華人民共和國社會保險法》), which was promulgated on October 28, 2010 and became effective on July 1, 2011, and was most recently amended on December 29, 2018 with effect on the same day, the Interim Regulations on the Collection and Payment of Social Insurance Premiums (《社會保險費徵繳暫行條例》), which were promulgated on January 22, 1999 and became effective on the same day, and were most recently amended on March 24, 2019 with effect on the same day, as well as the Regulations on Work-Related Injury Insurance (《工傷保險條例》), the Regulations on Unemployment Insurance (《失業保險條例》) and the Interim Measures for Maternity Insurance for Enterprise Employees (《企業職工生育保險試行辦法》), employers are required to provide employees with social insurance benefits, including basic pension insurance, basic medical insurance, work-related injury insurance, unemployment insurance and maternity insurance. Employers must complete social insurance registration with the local social insurance agencies, provide social insurance coverage for employees, and pay and withhold the relevant social insurance premiums in accordance with the law.

Pursuant to the Regulations on the Administration of Housing Provident Funds (《住房公積金管理條例》), which were promulgated on April 3, 1999 and became effective on the same day, and were most recently amended on March 24, 2019, employers are required to complete housing provident fund contribution registration with the housing provident fund management centers and establish housing provident fund accounts for their employees. Each employee may have only one housing provident fund account. Employers shall make housing provident fund contributions in full and on time, and shall not make late or insufficient contributions. Where an employer fails to complete housing provident fund contribution registration or fails to establish housing provident fund accounts for its employees, the housing provident fund management center shall order rectification within a prescribed period; failure to do so within such period may result in a fine ranging from RMB10,000 to RMB50,000. Where overdue contributions remain unpaid, enforcement may be sought through the people’s courts.

REGULATIONS RELATING TO CYBER SECURITY

Pursuant to the Cyber Security Law of the PRC (《中華人民共和國網絡安全法》) (the “**Cyber Security Law**”), which was promulgated by the SCNPC on November 7, 2016, came into effect on June 1, 2017, and was most recently amended on October 28, 2025, with effect from January 1, 2026, network operators shall comply with laws and regulations and fulfill their obligations to ensure the security of the network when conducting business and providing services. Those who provide services through networks shall take technical measures and other necessary measures in accordance with laws, regulations and compulsory national requirements to safeguard the safe and stable operation of the networks, respond to network security incidents effectively, prevent illegal and criminal activities committed on the network, and maintain the integrity, confidentiality and availability of network data. In addition, the network operators shall neither collect the personal information irrelevant to the services provided by them nor collect or use the personal information in violation of the provisions of any laws or administrative regulation or the agreement between both parties.

The Data Security Law of the PRC (《中華人民共和國數據安全法》) (the “**Data Security Law**”) was promulgated on June 10, 2021 and became effective on September 1, 2021. It establishes a data protection system based on the category and security level of the data in terms of its importance for economic and social development and the potential harm caused by illegal use of such data to national security, public interest or rights and interests of individuals and organizations. Competent governmental authorities shall be responsible to formulate lists for “important data.” Higher level of protection shall apply to “national core data” which refers to data that are vital to national security, economy, people’s livelihood and major public interests. Pursuant to the Data Security Law, data activities affecting or likely to affect national security will be subject to national security review under the data security review system. The data relating to safeguarding national security and interests and performance of international obligations shall be subject to export control of China. In addition, the Data Security Law provides that important data processors shall appoint

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a data security officer and establish a management department to take charge of data security, and such processors shall evaluate the risk of their data activities periodically and file assessment reports with the relevant regulatory authorities. Furthermore, data transaction intermediary service providers shall check the sources of the data, the identities of parties involved in the data transactions and keep records accordingly. Violation of Data Security Law may subject the relevant entities or individuals to warning, fines, suspension of business for rectification, revocation of permits or business licenses, and/or even criminal liabilities. Pursuant to the Data Security Law, the maximum monetary fine imposed on the breaching party is RMB10 million. Since the Data Security Law is relatively new, uncertainties still exist in relation to its interpretation and implementation.

REGULATIONS RELATING TO FOREIGN EXCHANGE CONTROL

According to the PRC Foreign Currency Administration Rules (《中華人民共和國外匯管理條例》) promulgated by the State Council on January 29, 1996, taking effect on April 1, 1996 and amended on January 14, 1997 and August 5, 2008, the RMB is generally freely convertible for current account items, including the distribution of dividends, trade and service related foreign exchange transactions, but not for capital account items, such as direct investment, loan, repatriation of investment and investment in securities outside the PRC. unless the prior approval of the State Administration of Foreign Exchange (the “SAFE”) is obtained.

According to the Notice of the State Administration of Foreign Exchange on Reforming and Regulating Policies on the Control over Foreign Exchange Settlement 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》) (the “Notice”) which was promulgated by the SAFE on June 9, 2016, came into effect on the same day, and was most recently amended on December 4, 2023, with effect from the same day, the settlement of foreign exchange receipts under the capital account (including but not limited to foreign exchange capital, external debts and funds recovered from overseas listing, etc.) may convert from foreign currency into RMB on self-discretionary basis. The RMB funds obtained by a domestic entity from its discretionary settlement of foreign exchange receipts under the capital account shall be included in the account pending for foreign exchange settlement and payment. The Notice reiterates the principle that RMB converted from foreign currency capital may not directly or indirectly used for the purpose beyond the business scope of the domestic entity and investments in securities with the exception of banks’ principal-secured products. The ratio of the discretionary exchange rate of foreign exchange receipts under domestic capital account is tentatively set at 100%. The SAFE may adjust the above ratio in due time according to the balance of payment status.

REGULATIONS RELATING TO EQUITY INCENTIVE PLANS

Pursuant to the Notice of the State Administration of Foreign Exchange on Issues Concerning the Foreign Exchange Administration of Domestic Individuals Participating in Equity Incentive Plans of Overseas Listed Companies (《國家外匯管理局關於境內個人參與境外上市公司股權激勵計劃外匯管理有關問題的通知》), promulgated on February 15, 2012 and effective on the same day, and other applicable regulations, directors, supervisors, senior management members and other employees participating in equity incentive plans of overseas listed companies who are PRC citizens (including individuals holding Hong Kong, Macau or Taiwan residency status) or foreign individuals who have continuously resided in the PRC for not less than 1 year are, subject to certain exceptions, required to complete registration with the SAFE. All such participants are further required to collectively entrust, through their respective PRC onshore entities, a single qualified domestic agent to handle matters relating to foreign exchange registration, account opening, fund transfers and foreign exchange settlement. In addition, a single overseas institution shall be designated to centrally handle matters relating to the exercise of equity interests, the purchase and sale of the corresponding shares or equity interests, and the remittance of related funds. Failure to complete the foregoing SAFE registration procedures may subject the participating directors, supervisors, senior management members and other employees to fines and other legal sanctions.

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REGULATIONS RELATING TO TAXATION

Enterprise Income Tax

Pursuant to the Enterprise Income Tax Law of the PRC (《中華人民共和國企業所得稅法》), which was promulgated on March 16, 2007 and became effective on January 1, 2008, and was most recently amended on December 29, 2018 with effect from the same day, a uniform enterprise income tax rate of 25% applies to foreign-invested enterprises, foreign enterprises that have establishments or places within the PRC, as well as PRC enterprises. Enterprises incorporated outside the PRC whose “de facto management bodies” are located within the PRC are deemed “resident enterprises” and are generally subject to enterprise income tax at the uniform rate of 25% on their worldwide income.

Pursuant to the Administrative Measures for the Identification of High and New Technology Enterprises (《高新技術企業認定管理辦法》), which was promulgated by the Ministry of Science and Technology, the Ministry of Finance and the State Taxation Administration on April 14, 2008 and most recently amended on January 29, 2016, enterprises that qualify as high and new technology enterprises are eligible for a preferential enterprise income tax rate of 15%. The qualification as a high and new technology enterprise is valid for 3 years from the date of issuance of the relevant certificate, and an enterprise may reapply for such qualification upon expiration.

Value-Added Tax

Pursuant to Value-added Tax Law of the PRC (《中華人民共和國增值稅法》), promulgated on December 25, 2024, and became effective on January 1, 2026, all enterprises and individuals engaged in the sale of goods, the provision of processing, repair and replacement services, sales of services, intangible assets, real property, and the importation of goods within the territory of the PRC shall be liable to pay VAT, the VAT tax rates generally applicable are simplified as 13%, 9%, 6% and 0%, the VAT tax rate applicable to the small-scale taxpayers is 3%. Regulations for the Implementation of the Value-Added Tax Law of the PRC (《中華人民共和國增值稅法實施條例》), promulgated on December 25, 2025, and became effective on January 1, 2026 has detailed taxpayers and scope of taxation, clarify the applicable tax rates and determine the calculation methods for tax payable in different situations.

REGULATIONS RELATING TO OVERSEAS INVESTMENT

Pursuant to the Measures for the Administration of Overseas Investment by Enterprises (《企業境外投資管理辦法》), promulgated by the NDRC on December 26, 2017 and effective on March 1, 2018, investment entities conducting overseas investment are required to perform the relevant procedures for approval or filing of overseas investment projects, report relevant information, and cooperate with supervision and inspection.

Pursuant to the Administrative Measures for Overseas Investment (《境外投資管理辦法》), promulgated by the Ministry of Commerce on March 16, 2009 and effective on May 1, 2009, and most recently revised on September 6, 2014 with effect from October 6, 2014, “overseas investment” refers to the activities whereby enterprises lawfully established in the PRC own non-financial enterprises overseas or acquire ownership interests, controlling rights, operational management rights or other interests in existing non-financial enterprises outside the PRC through greenfield investments, mergers and acquisitions or other means. Where an enterprise’s overseas investment involves sensitive countries or regions or sensitive industries, such investment shall be subject to approval-based administration. Overseas investments in other circumstances shall be subject to filing-based administration. Where an overseas enterprise invested in by an enterprise conducts further overseas reinvestment, the enterprise shall, after completing the relevant procedures under the laws of the jurisdiction where such reinvestment is made, report such reinvestment to the competent commerce authorities.

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Pursuant to the Provisions of the State Council on Overseas Investment (《國務院關於對外投資的規定》), which were promulgated by the State Council on May 5, 2026 and became effective on July 1, 2026, PRC investors conducting direct or indirect overseas investment are required to comply with the applicable approval or filing, information reporting and cross-border funds registration requirements and cooperate with supervision and inspection. Overseas investments that affect or may affect national security are subject to security review. Investors and their overseas invested enterprises are also required to improve their governance structures and establish and improve systems for compliance management, internal control, work safety and emergency response. Violations may result in orders to rectify or cease the relevant investment, disposal of relevant shares or assets, confiscation of illegal gains, fines and restrictions on conducting overseas investment.

Pursuant to the Regulations on Foreign Exchange Administration of Overseas Direct Investment by Domestic Institutions (《境內機構境外直接投資外匯管理規定》), promulgated by the SAFE on July 13, 2009 and effective on August 1, 2009, and the Notice on Further Simplifying and Improving the Foreign Exchange Management Policies for 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》), promulgated by the SAFE on February 13, 2015 and effective on June 1, 2015, and partially repealed on December 30, 2019, PRC enterprises, upon obtaining approval for overseas investment, are required to apply to banks at their places of registration for overseas direct investment foreign exchange registration.

REGULATIONS RELATING TO DIVIDEND DISTRIBUTIONS

Pursuant to the Foreign Investment Law, foreign investors, according to the present PRC Law, may freely remit into or out of the PRC, in RMB or any other foreign currency, their capital contributions, profits, capital gains, income from asset disposal, intellectual property royalties, lawfully acquired compensation, indemnity or liquidation income and so on within the territory of PRC. In addition, pursuant to the Company Law, a company established in PRC must set aside at least 10% of its after-tax profit based on PRC accounting standards each year to its general reserves until its cumulative total reserve funds reach 50% of its registered capital. These reserve funds, however, may not be distributed as cash dividends.

Pursuant to the Arrangement between the Mainland of China 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 (《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》) signed by the Central People’s Government of Mainland of China and the Government of the Hong Kong Special Administrative Region on August 21, 2006, the PRC Government may impose tax on dividends paid by a PRC company to a Hong Kong resident (including natural person and legal entity), but such tax shall not exceed 10% of the total amount of dividends payable. If a Hong Kong resident directly holds 25% or more of the equity interests in a PRC company and the Hong Kong resident is the beneficial owner of the dividends and meets other conditions, such tax shall not exceed 5% of the total amount of dividends payable by the PRC company. The Fifth Protocol to the Arrangement between the Mainland of China 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》) issued by the State Taxation Administration of the PRC (“STA”) and effective on December 6, 2019 provides that such provisions shall not apply to arrangements or transactions made for one of the primary purposes of obtaining such tax benefits.

Pursuant to the Administrative Measures on Entitlement of Non-resident Taxpayers to Preferential Treatment under Tax Treaties (《非居民納稅人享受協定待遇管理辦法》), which was promulgated by the STA on October 14, 2019 and became effective on January 1, 2020, non-resident taxpayers are entitled to preferential treatment under the tax treaties through self-determination, self-declaration and keeping and documenting relevant information for inspection. Where a non-resident taxpayer self-assesses and concludes that it satisfies the criteria for claiming treaty

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benefits, it may enjoy treaty benefits at the time of tax declaration or at the time of withholding declaration through a withholding agent, simultaneously gather and retain the relevant materials pursuant to the regulations for future inspection, and be subject to subsequent administration by tax authorities.

REGULATIONS RELATING TO SECURITIES AND OVERSEAS ISSUANCE AND LISTING

Pursuant to the Trial Administrative Measures for the Overseas Securities Offering and Listing by Domestic Companies (《境內企業境外發行證券和上市管理試行辦法》) (the “**Overseas Listing Trial Measures**”) and the 5 related guidelines, which were promulgated by the China Securities Regulatory Commission (the “**CSRC**”) on February 17, 2023 and became effective on March 31, 2023, domestic companies are subject to filing and reporting obligations in connection with overseas securities offerings and listings. Under the Overseas Listing Trial Measures, PRC domestic companies seeking to directly or indirectly offer and list securities on overseas markets (the “**Overseas Offering and Listing**”) are required to complete filing procedures with the CSRC and submit filing reports, legal opinions and other relevant documents. Where an issuer conducts an initial public offering or initial listing overseas, it shall complete filing with the CSRC within 3 working days after submitting the application documents for the overseas offering and listing to the relevant overseas securities regulatory authorities or stock exchanges.

Pursuant to the Provisions on Strengthening Confidentiality and Archives Administration in Connection with Overseas Securities Offering and Listing by Domestic Companies (《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》), which were promulgated on February 24, 2023 and became effective on March 31, 2023, domestic companies conducting overseas offerings and listings, as well as securities companies and securities service providers providing related services, are required to strictly comply with applicable PRC laws and regulations and the requirements thereunder, strengthen awareness of safeguarding state secrets and enhancing archives management, establish and improve confidentiality and archives management systems, and take necessary measures to implement confidentiality and archives management responsibilities. Such entities shall not disclose state secrets or working secrets of state authorities, nor jeopardize national or public interests. Where domestic companies, in connection with overseas offering and listing activities, provide or publicly disclose, or cause their overseas listing entities to provide or publicly disclose, documents or materials involving state secrets or working secrets of state authorities to securities companies, securities service providers, overseas regulatory authorities or other entities or individuals, they shall obtain approval from the competent authorities with approval authority in accordance with the law and complete filing with the competent confidentiality administrative authorities at the same level.