

REGULATORY OVERVIEW

Our business activities are subject to extensive supervision and regulation by the PRC government. This section sets forth a summary of the major laws, rules and regulations that are applicable to our current business activities within the territory of the PRC.

REGULATIONS RELATING TO THE ARTIFICIAL INTELLIGENCE INDUSTRY

Promulgated respectively on March 12, 2021 and July 20, 2017, The Outline of the 14th Five-Year Plan for National Economic and Social Development of the People’s Republic of China and Outlines of Objectives in Perspective of the Year 2035 (《中華人民共和國國民經濟和社會發展第十四個五年規劃和2035年遠景目標綱要》), approved by the Fourth Session of the 13th National People’s Congress on March 11, 2021, and The Development Plan of New Generation Artificial Intelligence (《新一代人工智能發展規劃》), issued by the State Council on July 8, 2017, clarify key technological priorities. They stipulate that China shall accelerate R&D in high-end chips, operating systems, core AI algorithms and sensors, and secure breakthroughs in basic theories, fundamental algorithms and equipment materials.

On December 31, 2021, the MIIT, the CAC, the Ministry of Public Security (the “MPS”) and the State Administration for Market Regulation (the “SAMR”) jointly issued the Provisions on the Administration of Algorithm Recommendation for Internet Information Services (《互聯網信息服務算法推薦管理規定》), which became effective on March 1, 2022. Application of algorithm recommendation refers to the use of algorithmic technologies such as generation and synthesis, personalized push, sorting and selection, retrieval and filtering, scheduling decision-making to provide information to users. Algorithm recommendation service providers with public opinion attribute or social mobilization ability shall go through record-filing formalities within 10 business days from the date of provision of services.

REGULATIONS ON INFORMATION SECURITY AND PRIVACY PROTECTION

Information Security

According to the National Security Law of the PRC (《中華人民共和國國家安全法》) promulgated by the Standing Committee of National People’s Congress, or the SCNPC on July 1, 2015, which came into effect on the same day, the state shall establish systems and mechanisms for national security review and supervision, conduct national security review on key technology and network information technology products and services related to state security, so as to prevent and neutralize state security risks in an effective way.

The Cyber Security Law of the PRC (《中華人民共和國網絡安全法》), promulgated by the SCNPC on November 7, 2016 and effective on June 1, 2017, requires key information infrastructure network operators to store domestic personal information and important data locally, and subject their purchase of network products/services affecting national security to cyber security review. Issued jointly by the CAC and other authorities on December 28, 2021 and effective on February 15, 2022, the Cybersecurity Review Regulation (《網絡安全審查辦法》) mandates critical information infrastructure and Internet platform operators to conduct such review for relevant products/services or data processing activities. Additionally, Internet platforms with over one million users’ personal information must report for review before overseas listing; authorities may initiate review if national security is affected or potentially affected.

On June 10, 2021, the SCNPC promulgated the Law of the People’s Republic of China on Data Security (《中華人民共和國數據安全法》), or the Data Security Law, effective as of September 1, 2021. The Data Security Law provides that organizations and individuals carrying out data activities shall establish a system for the classification and protection of data,

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and formulate a catalog of important data in order to strengthen the protection of important data. Processors of important data shall specify the person in charge of data security and the management organization, and implement the responsibility for data security protection. Further, on September 24, 2024, the State Council issued the Regulation on the Administration of Cyber Data Security (《網絡數據安全管理條例》), or the Cyber Data Security Regulation, which took effective from January 1, 2025. The Cyber Data Security Regulation stipulated certain requirements on network data processing activities, the security and protection of network data, and the reasonable and effective use of network data, and further shed light on the protection of personal information, security of important data, management of cross-border security of network data and obligations of network platform service providers.

REGULATIONS RELATING TO FOREIGN INVESTMENT

The establishment, operation and management of corporate entities in the PRC is governed by the Company Law of the PRC (《中華人民共和國公司法》), which was most recently amended on December 29, 2023 and became effective on July 1, 2024. Where laws on foreign investment provide otherwise, such provisions shall prevail.

Effective January 1, 2020, the Foreign Investment Law of the PRC (《中華人民共和國外商投資法》, FIL) and its Implementation Regulations (《中華人民共和國外商投資法實施條例》) replaced the previous three foreign investment laws, defining foreign investment and establishing a framework for its promotion, protection and administration. Pursuant to the FIL, China adopts a national treatment system with a State Council-issued and adjusted negative list, which prohibits or restricts foreign investment in specific industries (with restricted industries subject to stipulated conditions) and grants equal treatment to foreign investment outside the list. The NDRC and MOFCOM issued the 2024 Negative List (《外商投資准入特別管理措施(負面清單)(2024年版)》) on September 6, 2024 (effective November 1, 2024) and the 2025 Encouraging Catalog (《鼓勵外商投資產業目錄(2025年版)》) on December 15, 2025 (effective February 1, 2026), specifying restricted and encouraged industries respectively.

REGULATIONS RELATING TO OVERSEAS INVESTMENT

Pursuant to the Administrative Measures for Overseas Investment (《境外投資管理辦法》) promulgated by the MOFCOM on September 6, 2014 and implemented on October 6, 2014, the MOFCOM and provincial competent commerce authorities shall carry out administration either by record-filing or approval, depending on different circumstances of overseas investment by enterprises.

Pursuant to the Administrative Measures for Overseas Investment of Enterprises (《企業境外投資管理辦法》) promulgated by the NDRC on December 26, 2017 and implemented on March 1, 2018, a domestic enterprise, or the investor, making an outbound investment shall obtain approval or conduct record-filing for outbound investment projects, report relevant information, and cooperate with the supervision and inspection.

REGULATIONS RELATING TO FOREIGN EXCHANGE

The principal regulations governing foreign currency exchange in China are the Foreign Exchange Administration Regulations of the PRC (《中華人民共和國外匯管理條例》), which was promulgated by the State Council on January 29, 1996, and most recently amended on August 5, 2008. Pursuant to these regulations and other PRC rules and regulations on currency conversion, Renminbi is freely convertible for payments of current account items, such as trade-and service-related foreign exchange transactions and dividend payments, but not freely

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convertible for capital account items, such as direct investment, loan or investment in securities outside China unless prior approval of the State Administration of Foreign Exchange, or the SAFE or its local counterpart is obtained.

On October 23, 2019 and on December 4, 2023, the SAFE promulgated and amended the Notice for Further Advancing the Facilitation of Cross-border Trade and Investment (《關於進一步促進跨境貿易投資便利化的通知》), which, among other things, allows all foreign invested enterprises to use Renminbi converted from foreign currency denominated capital for equity investments in China, as long as the equity investment is genuine, does not violate applicable laws, and complies with the negative list on foreign investment. Pursuant to the Circular of the State Administration for Foreign Exchange on Optimizing Foreign Exchange Administration to Support the Development of Foreign-related Business (《國家外匯管理局關於優化外匯管理支持涉外業務發展的通知》) promulgated and effective on April 10, 2020, by the SAFE, the reform of facilitating the payments of incomes under the capital accounts shall be promoted nationwide.

REGULATIONS RELATING TO INTELLECTUAL PROPERTY

Patents

According to the Patent Law of the PRC (《中華人民共和國專利法》) which was most recently amended on October 17, 2020, and the revised version of which became effective on June 1, 2021, and its Implementation Rules (《中華人民共和國專利法實施細則》) which were most recently amended on December 11, 2023, and the revised version of which became effective on January 20, 2024, the patent administrative department of the State Council is responsible for administering patents in the PRC. The patent administration departments of provincial or autonomous regions or municipal governments are responsible for administering patents within their respective jurisdictions. The Patent Law of the PRC and its implementation rules provide for three types of patents, “invention”, “utility model” and “design.” The Chinese patent system adopts a “first come, first file” principle, which means that where more than one person files a patent application for the same invention, a patent will be granted to the person who files the application first.

Copyright and Software Products

In accordance with the Copyright Law of the People’s Republic China (《中華人民共和國著作權法》), with latest revision effective on June 1, 2021, Chinese citizens, legal persons or organizations without legal personality enjoy copyright over their works, whether published or not, including written works; oral works; musical, dramatic, opera, dance, acrobatic artistic works; fine arts, architectural works; photographic works; audio-visual works; graphic works and model works, such as engineering design plan, product design plan, map, schematic diagram, etc.; computer software and any other intellectual achievements which comply with the characteristics of the works.

According to the Regulations on the Protection of Computer Software (《計算機軟件保護條例》), which was last amended by the State Council on January 30, 2013 and came into effect on March 1, 2013, software created by Chinese citizens, legal entities or other organizations, whether published or not, shall enjoy copyright protection. Software copyrights shall be valid since the completion date of its creation. The term of protection of software copyright which belongs to a legal entity or other organizations shall be fifty years, expiring on December 31 of the fiftieth year after the first publication of such software, provided that any such software that has not been published within fifty years after the completion of its creation shall no longer be protected.

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According to the Measures for the Registration of Computer Software Copyright (《計算機軟件著作權登記辦法》), which was promulgated by the National Copyright Administration of the People’s Republic of China (“NCA”) and became effective on February 20, 2002 and was amended on June 18, 2024 and effective from July 1, 2024, the NCA shall be in charge of the administration of the registration of software copyright of the whole country, and the China Copyright Protection Center is the body for software registration. The applicant can apply for registration of software copyright, and the registration of exclusive license contracts and transfer contracts of software copyright.

Domain Names

Pursuant to the Measures for the Administration of Internet Domain Names (《互聯網域名管理辦法》) promulgated by MIIT on August 24, 2017, and effective from November 1, 2017, MIIT supervises and administers domain services nationwide. The principle of “first come, first serve” is followed for the domain name registration service. Applicants of domain name registration shall provide the domain name registration authority with true, accurate and complete information about the identity of the domain name holder for registration purpose and sign a registration agreement with it. After completing the domain name registration, the applicant becomes the holder of the domain name registered by him/her/it.

Trademarks

According to the Trademark Law of the PRC (《中華人民共和國商標法》), which was last amended by the SCNPC on April 23, 2019 and came into effect on November 1, 2019, and the Detailed Rules for the Implementation of Trademark Law of the PRC (《中華人民共和國商標法實施條例》), which was amended by the State Council on April 29, 2014 and came into effect on May 1, 2014, registered trademarks include commodity trademarks, service trademarks, collective trademarks and certificate trademarks. A registered trademark is valid for ten years and is renewable every ten years since the day after the expiration date of the previous term of validity of the trademark where a registered trademark needs to be used after the expiration of its validity term.

Trade Secret

The principal legal provisions governing market competition are set out in the Anti-unfair Competition Law of the PRC (《中華人民共和國反不正當競爭法》), or the Anti-Unfair Competition Law, which was promulgated by the SCNPC on September 2, 1993, and was most recently amended on June 27, 2025, and effective from October 15, 2025. In accordance with the Anti-Unfair Competition Law, operators should abide by the principles of voluntariness, equality, fairness, honesty, and integrity, and abide by laws and recognized business ethics when trading in the market.

REGULATIONS RELATING TO TAXATION

Enterprise Income Tax

Pursuant to the PRC Enterprise Income Tax Law (《中華人民共和國企業所得稅法》), or the EIT Law promulgated by the NPC on March 16, 2007, and most recently amended on December 29, 2018, and effective from the same date and the PRC Enterprise Income Tax Implementation Regulations (《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 most recently amended on December 6, 2024, and took effective on January 20, 2025, enterprises are divided into resident enterprises and non-resident enterprises. Resident enterprises are enterprises which are set up in China in accordance with the law, or enterprises which are set up in accordance with the law of a foreign country (region) and whose actual administration institution is in China. Resident enterprises

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are subject to a uniform 25% enterprise income tax rate on their worldwide income. The enterprise income tax rate is reduced by 20% for qualifying small low-profit enterprises. The high-tech enterprises that need full support from the PRC's government will enjoy a 15% preferential tax rate for Enterprise Income Tax.

Pursuant to the Circular of the State Taxation Administration on the Issues Concerning Implementation of the Preferential Income Tax Policy for High and New Technology Enterprises (《國家稅務總局關於實施高新技術企業所得稅優惠政策有關問題的公告》), which was promulgated by the SAT and became effective on June 19, 2017, for the year when the qualification of high and new technology enterprise expires, its corporate income tax is temporarily paid at a rate of 15% before its re-examination, provided the high and new technology enterprise has not obtained the qualification of high and new technology enterprise before the end of the year, it shall supplement the tax balance for the corresponding period as required. Pursuant to the Administrative Measures for the Recognition of High and New Technology Enterprises (《高新技術企業認定管理辦法》), promulgated on January 29, 2016 and effected on January 1, 2016, the certificate of a high and new technology enterprise is valid for three years from the date of issuance.

Value-added Tax

According to the Value Added Tax Law of the PRC (《中華人民共和國增值稅法》) promulgated by the SCNPC on December 25, 2024, or the VAT Law, which came into effect on January 1, 2026, all entities or individuals in the PRC engaged in the sale of goods, processing services, repair and replacement services, and the provision of services, sales of intangible assets, real estate and importation of goods are required to pay value-added tax ("VAT").

REGULATIONS RELATING TO LABOR AND SOCIAL INSURANCE

Labor Law and Labor Contract Law

Pursuant to the Labor Law of the PRC (《中華人民共和國勞動法》) promulgated on July 5, 1994, and amended on August 27, 2009, and December 29, 2018, enterprises shall establish and improve their system of workplace safety and sanitation, strictly abide by state rules and standards on workplace safety, and conduct employee training on labor safety and sanitation in the PRC. Labor safety and sanitation facilities shall comply with statutory standards. Enterprises and institutions shall provide employees with a safe workplace and sanitation conditions which are in compliance with applicable laws and regulations of labor protection. The Labor Contract Law of the PRC (《中華人民共和國勞動合同法》) promulgated on June 29, 2007, and amended on December 28, 2012, and the Implementation Rules of the Labor Contract Law of the PRC (《中華人民共和國勞動合同法實施條例》) promulgated on September 18, 2008, set out specific provisions in relation to the execution, the terms and the termination of a labor contract and the rights and obligations of the employees and employers, respectively. At the time of hiring, the employers shall truthfully inform the employees the scope of work, working conditions, working place, occupational hazards, work safety, salary and other matters which the employees request to be informed about.

Social insurance

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, with effect from July 1, 2011, and most recently amended on December 29, 2018, and the Interim Regulations on the Collection of Social Insurance Fees (《社會保險費徵繳暫行條例》) issued by the State Council on January 22,

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1999, and last amended on March 24, 2019, employees shall participate in basic pension insurance, basic medical insurance and unemployment insurance. Basic pension, medical and unemployment insurance contributions shall be paid by both employers and employees. Employees shall also participate in work-related injury insurance and maternity insurance. Work-related injury insurance and maternity insurance contributions shall be paid by employers rather than employees. Pursuant to the Notice of the General Office of the State Council on Issuing the Plan for the Pilot Program of Combined Implementation of Maternity Insurance and Basic Medical Insurance for Employees (《國務院辦公廳關於印發<生育保險和職工基本醫療保險合併實施試點方案>的通知》) and the Opinions of the General Office of the State Council on Comprehensively Promoting the Implementation of the Combination of Maternity Insurance and Basic Medical Insurance for Employees (《國務院辦公廳關於全面推進生育保險和職工基本醫療保險合併實施的意見》) promulgated on January 19, 2017, and March 6, 2019, maternity insurance and basic medical insurance for employees shall be consolidated. Pursuant to the Social Insurance Law of the PRC, employers must carry out social insurance registration at the local social insurance agency, provide social insurance and pay or withhold the relevant social insurance premiums for or on behalf of employees. For employers failing to conduct social insurance registration, the administrative department of social insurance shall order them to make corrections within a prescribed time limit; if they fail to do so within the time limit, employers shall have to pay a penalty over one time but no more than three times of the amount of the social insurance premium payable by them. Where an employer fails to pay social insurance premiums in full or on time, the social insurance premium collection agency shall order it to pay or make up the balance within a prescribed time limit, and shall impose a daily late fee at the rate of 0.05% of the outstanding amount from the due date; if still failing to pay within the time limit prescribed, a fine of one time to three times the amount in default will be imposed on them by the competent administrative department.

Pursuant to the Interpretation II of the Supreme People’s Court of Issues Concerning the Application of Law in the Trial of Labor Dispute Cases (《最高人民法院關於審理勞動爭議案件適用法律問題的解釋(二)》) effective on September 1, 2025, where an employer and an employee agree or the employee undertakes that social insurance contributions need not be paid, the people’s court shall deem such agreement or undertaking invalid. Where the employer fails to make social insurance contributions in accordance with the law, and the employee requests to terminate the labor contract and claim economic compensation in accordance with item 3 under the first paragraph of Article 38 of the Labor Contract Law, the people’s court shall support such request in accordance with the law. Where the circumstances specified in the preceding paragraph apply, if the employer has made up the social insurance contributions in accordance with the law and requests the employee to return the social insurance compensation already paid, the people’s court shall support such request in accordance with the law.

Housing Fund

In accordance with the Regulations on the Management of Housing Fund (《住房公積金管理條例》), which was last amended by the State Council and came into effect on March 24, 2019, employers shall apply for housing fund deposit registration with the local housing fund administrative center, and shall open an housing fund account at the relevant bank. Employers failing to complete such registration and open such account may be ordered to make corrections within a prescribed time limit; if they fail to do so within the time limit, a fine of RMB10,000 to RMB50,000 will be imposed on them. Where an employer fails to pay the housing fund in full, the housing fund administrative center will order the employer to pay the amount within a prescribed time limit; if the employer still fails to pay the amount, the housing fund administrative center can apply to the People’s Court for compulsory enforcement of the outstanding amount.

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REGULATIONS RELATING TO REAL ESTATE LEASING

Pursuant to the PRC Civil Code (《中華人民共和國民法典》) which took effect on January 1, 2021, an owner of immovable or movable property is entitled to possession, use, earnings, and disposal of such property in accordance with the law. Subject to the consent of the lessor, the lessee may sublease the leased premises to a third party.

According to the Administrative Measures for Commodity House Leasing (《商品房屋租賃管理辦法》), which was promulgated by the Ministry of Housing and Urban-Rural Development of the People’s Republic of China on December 1, 2010 and came into effect on February 1, 2011, within 30 days after the conclusion of the house leasing contract, the parties involved in the house leasing shall carry out house leasing registration with the construction (real estate) administrative department.

REGULATIONS RELATING TO OVERSEAS SECURITIES LISTING AND OFFERING

CSRC Filing

On February 17, 2023, with the approval of the State Council, the China Securities Regulation Commission, or the CSRC promulgated the Trial Administrative Measures of 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》), or the Trial Administrative Measures and relevant several guidelines, which came into force on March 31, 2023.

Pursuant to the Trial Administrative Measures, PRC domestic companies that seek to offer or list securities overseas, both directly and indirectly, should fulfill the filing procedure and submit relevant information to the CSRC within three working days after the application for overseas listing is submitted to the competent overseas securities regulators. In addition, an overseas-listed company must also submit the filing with respect to its follow-on offerings, issuance of securities, and other equivalent offering activities, within a specific time frame requested under the Trial Administrative Measures. If a domestic company fails to complete the filing procedure or conceals any material fact or falsifies any major content in its filing documents, such domestic company may be subject to administrative penalties, such as an order to rectify, warnings, fines, and its controlling shareholders, actual controllers, the person directly in charge and other directly liable persons may also be subject to administrative penalties, such as warnings and fines.

On February 24, 2023, the CSRC, together with the Ministry of Finance, the National Administration of State Secrets Protection and the National Archives Administration of China, promulgated the Provisions on Strengthening the Confidentiality and File Management of Domestic Enterprises Related to Overseas Issuance of Securities and Listing (《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》), according to which, during the overseas offering and listing activities of domestic enterprises, domestic enterprises, securities companies and securities service providers providing corresponding services shall strictly abide by the relevant PRC laws and regulation as well as the requirements of the provisions, enhance legal awareness of guarding state secrets and strengthening the management of archives, establish and complete systems for confidentiality and archives work, employ necessary measures to implement the responsibility for confidentiality and archives management, and shall not divulge state secrets and work secrets of state organs, and shall not harm the interests of state and the public.

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H Share Full Circulation

“Full Circulation” represents listing and circulating on the Stock Exchange of the domestic unlisted shares of an H-share listed company, including unlisted domestic shares held by domestic shareholders prior to overseas listing, unlisted domestic shares additionally issued after overseas listing, and unlisted shares held by foreign shareholders. On November 14, 2019, CSRC announced the Guidelines for the “Full Circulation” Program for Domestic Unlisted Shares of H-share Listed Companies (《H股公司境內未上市股份申請“全流通”業務指引》 (“Guidelines for the ‘Full Circulation’”), which were amended on August 10, 2023. As regulated in the Guidelines for “Full Circulation,” shareholders of domestic unlisted shares have the flexibility to jointly decide the amount and proportion of shares that will be included in the circulation application. This decision should be reached through mutual consultation, ensuring compliance with relevant laws, regulations and policies governing state-owned asset administration, foreign investment and industry regulation. Meanwhile, the H-share listed company corresponding to these shares may be authorized to file for “full circulation” with the CSRC. An unlisted domestic joint stock company may file with the CSRC for “full circulation” at the time of [REDACTED] and listing overseas. After domestic unlisted shares are listed and circulated on the Stock Exchange, they may not be transferred back to China. Pursuant to the Trial Administrative Measures, which came into effect on March 31, 2023, for a domestic company directly offering and listing overseas, shareholders of its domestic unlisted shares applying to convert such shares into shares listed and traded on an overseas trading venue shall conform to relevant regulations promulgated by the CSRC. Additionally, they are required to authorize the domestic company to submit the conversion application to the CSRC on their behalf.

On December 31, 2019, China Securities Depository and Clearing Corporation Limited and Shenzhen Stock Exchange jointly announced the Measures for Implementation of the H-share “Full Circulation” Business, or the Measures for Implementation. The businesses of cross-border share transfer registration, maintenance of deposit and holding details, transaction entrustment and instruction transmission, settlement, management of settlement participants, services of nominal holders, etc., in relation to the H-share “Full Circulation” business, are subject to these Measures for Implementation.

In order to fully promote the reform of H-share full circulation and clarify the business arrangement and procedures for the relevant shares’ registration, custody, settlement and delivery, CSDC Shenzhen Branch promulgated and amended the CSDC Shenzhen Branch Circular on Issuing the Guide to the Program for Full Circulation of H-shares (《中國證券登記結算有限責任公司深圳分公司H股“全流通”業務指南》) on September 20, 2024 and June 27, 2025 respectively, which specifies the business preparation, account arrangement, cross-border share transfer registration and overseas centralized custody, and other relevant matters.