REGULATIONS ON CORPORATION AND 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 promulgated by the SCNPC on 29 December 1993 and came into effect on 1 July 1994, and last amended on 26 October 2018. The Company Law of the PRC generally governs two types of companies, namely limited liability companies and joint stock limited companies. Both types of companies have the status of legal persons, and the liability of shareholders of a limited liability company or a joint stock limited company is limited to the amount of registered capital they have contributed. The Company Law of the PRC also applies to foreign-invested companies in form of limited liability company or joint stock limited company. Where laws on foreign investment have other stipulations, such stipulations apply.

On 1 January 2020, the FIL and the Regulations on the Implementation of the Foreign Investment Law of the PRC (《中華人民共和國外商投資法實施條例》) became effective and simultaneously replaced the trio of prior laws regulating foreign investment in China, namely, the Sino-foreign Equity Joint Venture Enterprise Law of the PRC (《中華人民共和國中外合資經營企業法》), the Sino-foreign Cooperative Joint Venture Enterprise Law of the PRC (《中華人民共和國中外合作經營企業法》) and the Wholly Foreign-invested Enterprise Law of the PRC (《中華人民共和國外資企業法》), together with their implementation rules and ancillary regulations. The FIL sets out the definition of foreign investment and the framework for promotion, protection and administration of foreign investment activities. The FIL does not explicitly classify whether variable interest entities that are controlled through contractual arrangements would be deemed as foreign invested enterprises if they are ultimately "controlled" by foreign investors. However, it has a catch-all provision under definition of "foreign investment" that includes investments made by foreign investors in China through other means as provided by laws, administrative regulations of the State Council. Therefore, it still leaves leeway for future laws, administrative regulations or provisions of the State Council to provide for contractual arrangements as a form of foreign investment. On 30 December 2019, the MOFCOM and the State Administration for Market Regulation (國家市場監督管理總局) (the "**SAMR**") jointly promulgated the Measures for Reporting of Information on Foreign Investment (《外商投資信息報告辦法》), which came into effect on 1 January 2020 and pursuant to which, the establishment of the foreign invested enterprises, including establishment through purchasing the equities of a domestic enterprise or subscribing the increased capital of a domestic enterprise, and its subsequent changes are required to submit an initial or change report through the Enterprise Registration System.

Pursuant to the FIL, China has adopted a system of national treatment which includes a negative list with respect to foreign investment administration. The negative list is issued by, amended or released upon approval by the State Council, from time to time. The negative list sets forth industries in which foreign investments are prohibited and industries in which foreign investments are restricted. Foreign investment in prohibited industries is not allowed, while foreign investment in restricted industries must satisfy certain conditions stipulated in the negative list. Foreign investments and domestic investments in industries outside the scope of the prohibited industries and restricted industries stipulated in the negative list will be treated equally. The Special Administrative Measures (Negative List) for the Access of Foreign Investment (2021 Version) (《外商投資准入特別管理措施(負面清單)(2021年版)》) (the "**Negative List**"), which was promulgated by the NDRC and MOFCOM on 27 December 2021 and became

effective on 1 January 2022, and the Catalog of Industries for Encouraging Foreign Investment (2020 Version) (《鼓勵外商投資產業目錄(2020年版)》), which was promulgated by the NDRC and MOFCOM on 27 December 2020 and became effective on 27 January 2021, replaced previous negative list and encouraging catalog and listed the categories of encouraged, restricted, and prohibited industries. Pursuant to the Negative List, value-added telecommunication services (excluding e-commerce, domestic multi-party telecommunication, storage and forwarding business, and call center), radio and television program production and operation businesses in which the Group is involved fall into the restricted or prohibited categories.

According to Article 6 of the Negative List, for domestic enterprises engaged in business sectors prohibited from foreign investment under the Negative List, (i) the overseas offering, listing and trading of their shares shall be subject to the review and approval of the relevant competent authorities; and (ii) foreign investors shall not participate in the operation and management of these enterprises, and their shareholding ratio shall be implemented with reference to the relevant provisions on the administration of domestic securities investment of foreign investors. Pursuant to the Reply to Reporters' Questions by the NDRC Responsible Officers of the Special Administrative Measures (Negative List) for the Access of Foreign Investment (2021 Version) (國家發展改革委有關負責人就2021年版外商投資准入負面清單答記者問) announced on 27 December 2021, the aforementioned review and approval of the relevant competent authorities refers to the review and approval on whether the overseas listing of domestic enterprises falls within the scope of prohibitive provisions of the Negative List, rather than that on the activities of overseas listing of domestic enterprises. However, the Negative List provides no further explanation or interpretation for "the overseas offering, listing and trading of domestic enterprises' shares". Pursuant to the further explanation provided by the Policy Research Office of the NDRC at the press conference held by NDRC on 18 January 2022, "the scope of application of Article 6 of the Negative List is limited to the direct listing of domestic enterprises engaged in businesses in areas prohibited from investment in the Negative List. Regarding the indirect overseas listing of domestic enterprises, the CSRC is publicly soliciting opinions on the relevant provisions. After the relevant procedures are completed and relevant documents are officially published, the relevant provisions will be implemented by the competent authorities accordingly".

REGULATIONS ON VALUE-ADDED TELECOMMUNICATION SERVICES

Pursuant to the Telecommunications Regulations of the PRC (《中華人民共和國電信條例》) (the "**Telecommunications Regulations**") promulgated by the State Council on 25 September 2000, amended on 29 July 2014 and 6 February 2016, which provides a regulatory framework for telecommunications services providers in the PRC, telecommunications services are categorized into basic telecommunications services and value-added telecommunications services and the telecommunications services providers are required to obtain operating licenses prior to the commencement of their operations. Pursuant to the Catalog of Telecommunications Business (2015 version) (《電信業務分類目錄(2015年版)》), which was last amended on 6 June 2019, online data processing and transaction processing and internet information services and internet data center services that the Group will provide are classified as value-added telecommunications services.

The Administrative Measures on Internet Information Services (《互聯網信息服務管理辦法》) (the "**Internet Measures**") which was promulgated by the State Council on 25 September 2000 and amended on 8 January 2011, sets out the guidelines on the provision of internet information services. The Internet Measures classified internet information services into commercial internet information services and non-commercial internet information services and a commercial internet information services provider must obtain a value-added telecommunications business operation license from the appropriate telecommunications authorities. The content of internet information is highly regulated in the PRC and, pursuant to the Internet Measures, internet information services operators are required to monitor their websites. They may not produce, reproduce, disseminate or broadcast internet content that is prohibited by laws or administrative regulations on their websites. The PRC Government may order the holder of an ICP License that violates the content restrictions to correct those violations and revoke their ICP Licenses.

Pursuant to the Regulations for the Administrative of Foreign-Invested Telecommunications Enterprises (2016 Revision) (《外商投資電信企業管理規定(2016修訂)》) (the "**2016 FITE Regulations**"), which was promulgated by the State Council on 6 February 2016, foreign-invested value-added telecommunications enterprises in the PRC are required to be established as sino-foreign equity joint ventures, and the foreign investors may acquire up to 50% of the equity interests of such enterprises. In addition, the main foreign investor who invests in a foreign-invested value-added telecommunications enterprise operating the value-added telecommunications business in the PRC must demonstrate a good track record and experience in operating a value-added telecommunications business. Moreover, foreign invested enterprises that meet these requirements must obtain approvals from the MIIT to commence value-added telecommunications business in the PRC.

On 29 March 2022, the State Council promulgated the Decision of the State Council to Amend and Repeal Certain Administrative Regulations (《國務院關於修改和廢止部分行政法規的決定》) (the "**2022 Decision**") which became effective on 1 May 2022 and is to revise the 2016 FITE Regulations and other relevant administrative regulations. Subsequently, on 7 April 2022, the full text of 2022 Decision was published on the official website of the State Council. As compared to the 2016 FITE Regulations, the 2022 Decision amends the concept of "foreign-invested telecommunication enterprises" to "the enterprise which is legally formed by foreign investors within the territory of the PRC and is engaged in provision of telecommunications services", being connected to the concept of "foreign-invested enterprises" under the FIL. The 2022 Decision adds "except as otherwise provided for by the State" to Article 6 of the 2016 FITE Regulations, demonstrating that there may be exceptions of foreign investors' shareholding ratio in telecommunications sectors under relevant provisions.

The 2022 Decision also removes the requirement that "the main foreign investor of a foreign-invested value-added telecommunications enterprise which is engaged in the value-added telecommunications business in the PRC should have a good track record and experience in operating the value-added telecommunications business" and streamlines application process of telecommunication business operation permit and shorten the review time period.

As advised by our PRC Legal Advisers; (i) as at the Latest Practicable Date, there were no clear guidelines, explanations or criteria in respect of the implementation of the 2022 Decision; (ii) it is uncertain when guidelines, interpretations or criteria for the implementation of the 2022 Decision will be promulgated; and (iii) based on the current regulatory requirements, the 2022 Decision would not affect the validity and the legality of Group's ICP Licenses and IDC License. Our Directors confirm that the 2022 Decision has no adverse impact on the Group's business operations.

On 13 July 2006, the Ministry of Information Industry of the PRC (the "**MII**", which is the predecessor of the MIIT) promulgated the Circular on Strengthening the Administration of Foreign Investment in and Operation of Value-added Telecommunications Business (《關於加強外商投資經營增值電信業務管理的通知》) (the "**MIIT Circular**"), pursuant to which, a domestic company that holds a value-added telecommunications business operation licenses is prohibited from leasing, transferring or selling the license to foreign investors in any form, and from providing any assistance, including providing resources, sites or facilities, to foreign investors that conduct value-added telecommunications business illegally in China. In addition, under the MIIT Circular, the internet domain names and registered trademarks used by a foreign-invested value-added telecommunications service operator must be legally owned by that operator or its shareholders. Sinohealth Information, Guangzhou Jiasi, Sinohealth Junyi have each obtained ICP License. In addition, both Guangzhou Jiasi and Sinohealth Junyi have obtained value-added telecommunication business operation license for online data processing and transaction processing, or EDI License. Sinohealth Information also has obtained the IDC license.

On 28 June 2016, the Cyberspace Administration of China, or the CAC, promulgated the Administrative Provisions on Mobile Internet Applications Information Services (《移動互聯網應用程序信息服務管理規定》) (the "**Provisions**"), which became effective on 1 August 2016. Under the Provisions, mobile application providers are prohibited from engaging in any activity that may endanger national security, disturb the social order, or infringe the legal rights of third parties, and may not produce, copy, issue or disseminate through internet mobile applications any content prohibited by laws and regulations. The Provisions also require application providers to procure relevant qualifications required by laws and regulations to provide services through such applications and require application store service providers to register with local branches of the CAC within 30 days after they start providing application store services.

REGULATIONS ON INTERNET DRUG INFORMATION SERVICE

Internet Drug Information Service

Pursuant to the Administrative Measures on Internet Drug Information Services (《互聯網藥品信息服務管理辦法》) promulgated by the State Food and Drug Administration (which is the predecessor of the China Food and Drug Administration, or the "**CFDA**", and CFDA is the predecessor of the National Medical Products Administration) on 8 July 2004 and amended on 17 November 2017, the internet drug information service, i.e. provision of information of drugs and medical devices through the internet, is classified into commercial internet drug information services and non-commercial internet drug information services. The competent food and drug authority reviews the website operated by an entity that applies for providing internet drug information services and issues the Internet Drug Information Service Certificate (《互聯網藥品信息服務許可證》) to such entity once meets the requirements.

Sinohealth Information, Guangzhou Jiasi, Guangzhou Xinkang have obtained Internet Drug Information Service Certificate respectively.

REGULATIONS ON ONLINE TRADING AND E-COMMERCE

On 26 January 2014, the State Administration for Industry and Commerce (the "**SAIC**", which is the predecessor of the SAMR) promulgated the Administrative Measures for Online

Trading, or the Online Trading Measures (《網絡交易管理辦法》), which became effective on 15 March 2014, to regulate all operating activities for product sales and services provision via the internet (including mobile internet). It stipulated the obligations of online products operators and services providers and certain special requirements applicable to third-party platform operators. The Measures were replaced by the Measures for the Supervision and Administration of Online Transactions (《網絡交易監督管理辦法》), which was promulgated by the SAMR on 15 March 2021 and became effective on 1 May 2021. Furthermore, MOFCOM promulgated the Provisions on the Procedures for Formulating Transaction Rules of Third-Party Online Retail Platforms (Trial) (《網絡零售第三方平台交易規則制定程序規定(試行)》) on 24 December 2014, which became effective on 1 April 2015, to guide and regulate the formulation, revision and enforcement of transaction rules by online retail third-party platforms operators. These measures impose more stringent requirements and obligations on third-party platform operators. On 31 August 2018, the SCNPC promulgated the E-Commerce Law of the PRC (《中華人民共和國電子商務法》) (the "**E-Commerce Law**"), which became effective on 1 January 2019. It established the basic legal framework for the development of China's E-Commerce business and clarified the obligations of the operators of e-commerce platforms and the possible legal consequences if operators of e-commerce platforms are found to be in violation of legally prescribed obligations. For example, pursuant to the E-Commerce Law, an operator of an e-commerce platform shall give appropriate reminders to, and make it convenient for operators on its platform who have not completed the formalities for registration of market entities to, complete such formalities. Also, an operator of an e-commerce platform is legally obligated to verify and register the information of the business operators on its platform, prepare emergency plans in response to possible cyber security incidents, keep transaction information for no less than three years from the date on which the transaction has been completed, establish rules on the protection of intellectual property rights and conform to the principle of openness, fairness and justice. Violation of the provisions of the E-Commerce Law may entail being ordered to make corrections within a prescribed period of time, confiscation of gains illegally obtained, fines, suspension of business, inclusion of such violations in the credit records and possible civil liabilities.

REGULATIONS ON HEALTHCARE BIG DATA AND INFORMATION SECURITY AND DATA PRIVACY

Healthcare Big Data

On 21 June 2016, the General Office of the State Council promulgated the Guiding Opinions on Promoting and Regulating the Application and Development of Healthcare Big Data (《國務院辦公廳關於促進和規範健康醫療大數據應用發展的指導意見》), which stipulates that big data on health and medical treatment is a significant fundamental strategic resource and the State is to promote the sharing and disclosure of big data resources on health and medical treatment, encourage medical and health institutions to promote the collection and storage of big data on health and medical treatment, enhance application support and technical support for operation and maintenance, unblock the data resource sharing channels, accelerate the construction and perfection of an underlying database focusing on electronic health records, electronic medical records, and electronic prescriptions of residents, deepen the application of big data on health and medical treatment in all respects, and promote the establishment of a mechanism for sharing healthcare big data among various governmental authorities, including health authorities.

On 12 July 2018, the National Health Commission promulgated the Administrative Measures on Standards, Security and Services of National Healthcare Big Data (for Trial Implementation) (《國家健康醫療大數據標準、安全和服務管理辦法(試行)》) (the "**Measures on Healthcare Big Data**"), which became effective on the same day. The Measures on Healthcare Big Data set out the guidelines and principles for standards management, security management and services management of healthcare big data. Pursuant to the Measures on Healthcare Big Data, the healthcare data produced by PRC citizens in the PRC can be managed and used by the state for the purposes of the state's strategic safety and the benefits of the life and health of PRC citizens, provided that the state guarantees the PRC citizens their information, usage and personal privacy rights. The National Health Commission (including National Administration of Traditional Chinese Medicine) shall establish mechanisms for healthcare big data sharing, promote healthcare big data sharing and exchange, and lead the establishment of platform for the submission of the healthcare data, the catalog system of information resources and the system for information exchange. The National Health Commission with other relevant authorities shall be responsible for administration of healthcare big data nationwide together and each health authority above county level together with other relevant authorities shall be responsible for administration of healthcare big data within its jurisdiction. Medical institutions and relevant enterprises, including those entrusted by medical institutions to store or operate healthcare big data, shall, among other things, take measures such as data classification, data backup and encryption to ensure data security, and provide secured channels for information inquiries and copying.

Information Security and Data Privacy

On 28 May 2020, the NPC approved the Civil Code of the PRC (《中華人民共和國民法典》) (the "**Civil Code**"), which came into effect on 1 January 2021. Pursuant to the Civil Code, the personal information of a natural person shall be protected by the law. Any organization or individual that need to obtain personal information of others shall obtain such information legally and ensure the safety of such information, and shall not illegally collect, use, process or transmit personal information of others, or illegally purchase or sell, provide or make public personal information of others.

On 7 November 2016, the SCNPC promulgated the Cyber Security Law of the PRC (《中華人民共和國網絡安全法》) (the "**Cyber Security Law**"), which became effective on 1 June 2017. The Cyber Security Law requires network operators to perform certain functions related to cyber security protection and strengthen the network information management. For instance, under the Cyber Security Law, network operators of key information infrastructure generally shall, during their operations in the PRC, store personal information and important data collected and produced within the territory of the PRC. When collecting and using personal information, in accordance with the Cyber Security Law, network operators shall abide by the "lawful, justifiable and necessary" principles. The network operator shall collect and use personal information by announcing rules for collection and use, expressly notify the purpose, methods and scope of such collection and use, and obtain the consent of the person whose personal information is to be collected. The network operator shall neither collect the personal information unrelated to the services they provide, nor collect or use personal information in violation of the provisions of laws and administrative regulations or the agreements with such persons, and shall process the personal information they store in accordance with the provisions of laws and administrative regulations and agreements reached with such persons. Network operator shall not disclose,

tamper with or destroy personal information that it has collected, or disclose such information to others without prior consent of the person whose personal information has been collected, unless such information has been processed to prevent specific person from being identified and such information from being restored. Each individual is entitled to require a network operator to delete his or her personal information if he or she finds that collection and use of such information by such operator violate the laws, administrative regulations or the agreement by and between such operator and such individual, and is entitled to require any network operator to make corrections if he or she finds errors in such information collected and stored by such operator. The network operator shall take measures to delete the information or correct the error. Any individual or organization may neither acquire personal information by stealing or through other illegal ways, nor illegally sell or provide personal information to others. Medical institutions and relevant enterprises shall also comply with laws and regulation on classified protection of cyber security and cybersecurity reviews.

On 10 June 2021, the SCNPC promulgated the Data Security Law, which became effective on 1 September 2021. Pursuant to the Data Security Law, data refers to any record of information in electronic or any other form and data processing includes but is not limited to the the collection, storage, use, processing, transmission, provision, and public disclosure of data. Industrial sector, telecommunications, transportation, finance, natural resources, health, education, science and technology, and other departments shall undertake the duty to supervise data security in their respective industries and fields.

The Data Security Law 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 "key 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. According 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.

The Data Security Law stipulates that each organization or individual collecting data shall adopt legal and proper methods, and shall not steal or obtain data by other illegal methods, and the data processing activities shall comply with laws and regulations, respect social mores and ethics, comply with commercial ethics and professional ethics, be honest and trustworthy, perform obligations to protect data security, and undertake social responsibility; it shall not endanger national security, the public interest, or individuals' and organizations' lawful rights and interests.

Pursuant to the Data Security Law, entities conducting data processing activities, like the Group, must establish and improve a whole-process data security management system in accordance with the provisions of laws and regulations, organize and carry out data security education and training, and adopt corresponding technical measures and other necessary measures to ensure data security. Where the internet and other information networks are used to carry out data processing activities, the above-mentioned data security protection obligations shall be fulfilled using the network security level protection system. In addition, 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 the 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. Since the Data Security Law is relatively new, uncertainties still exist in relation to its interpretation and implementation.

On 13 April 2020, the CAC and ten other government departments jointly promulgated the the CAC Measures. The CAC Measures became effective on 1 June 2020. It stipulates that operators of critical information infrastructures who procure network products and services that affect or may affect national security shall submit to a cybersecurity review. On 28 December 2021, the CAC, jointly with other 12 governmental authorities, promulgated the CAC Measures II, which became effective on 15 February 2022 and replaced the CAC Measures. Subsequently, on 4 January 2022, the CAC published the full text of the CAC Measures II on its official website. According to the CAC Measures II, critical information infrastructure operators that intend to purchase internet products and services and online platform operators engaging in data processing activities, which affect or may affect national security, must be subject to cybersecurity review. The CAC Measures II further elaborates on the factors to be considered when assessing the national security risks of the relevant objects or situations, including, among others: (i) the risk of core data, important data, or a large amount of personal information being stolen, leaked, destroyed, and illegally used or illegally transferred abroad; and (ii) the risk of critical information infrastructure, core data, important data, or a large amount of personal information being affected, controlled, or maliciously used by foreign governments and the risk of cyber information security due to the listing. Also, an online platform operator which possesses personal information of over one million users and intends to have a "foreign (國外) [**REDACTED**]" must be subject to cybersecurity review.

Meanwhile, the CAC Measures II grants the CAC and other competent authorities the right to initiate a cybersecurity review without application, if any member organization of the cybersecurity review mechanism has reason to believe that any internet products, services or data processing activities affect or may affect national security.

On 14 November 2021, the CAC promulgated the Draft CAC Regulations. According to the Draft CAC Regulations, data processors shall, in accordance with relevant state provisions, apply for cybersecurity review when carrying out the following activities: (1) the merger, reorganization or separation of internet platform operators that have acquired a large number of data resources related to national security, economic development or public interests, which affects or may affect national security; (2) data processors that handle the personal information of more than one million people intends to be listed abroad; (3) the data processor intends to be listed in Hong Kong, which affects or may affect national security; (4) other data processing activities that affect or may affect national security. However, the Draft CAC Regulations provides no further explanation or interpretation for "affects or may affect national security". In addition, the Draft CAC Regulations also stipulate more detailed requirements (including obligations on training, record, evaluation, review, audit, filing, etc.) in respect of the data processing activities conducted by data processors through internet relating to personal data protection, important data safety, data cross-broader safety management and obligations of internet platform operators.

Assuming the Draft CAC Regulations become effective in their current form entirely in the future, subject to further implementation details, guidance or clarification of the Draft CAC Regulations, the relevant key obligations of training, record, evaluation, review, audit and filing which might be relevant to us in the future are summarized as follows: (i) important data processors shall conduct all-employee data security training on a yearly basis, and yearly training hours for data security-related technical and managerial personnel shall not be less than twenty (20) hours; (ii) data processors which provide, share, trade, contract of processing personal information, shall retain log records for specific period; (iii) data processors which intend to be listed overseas shall complete data security evaluation each year and submit evaluation report to competent authorities; data processors shall submit investigation and evaluation reports to competent authorities when specific data security incidents are settled; (iv) data processors shall, in accordance with relevant state provisions, apply for cybersecurity review when carrying out certain activities, including the data processor intends to be listed in Hong Kong, which affect or may affect national security; (v) data processors shall fulfil report obligation to competent authorities, in the event that the specific data security incident occurs such as leakage, damage, or loss of important data or specific amount of personal information; or the merger, reorganization, spin-off occurs to the specific data processors; (vi) data processors shall conduct regular compliance audits in relation to personal information processing activities; and (vii) the processors of any important data shall fulfil record-filing obligation with competent authorities within specific period upon the identification of important data. When the Draft CAC Regulations come into effect, we may be required to fulfil the abovementioned obligations where applicable.

According to the Draft CAC Regulations, data processors that process personal information of more than one million people shall also comply with the provisions on important data safety of the Draft CAC Regulations for important data processors. Our Directors confirm that, to the best of their knowledge, we had not been identified as an important data processor as at the Latest Practicable Date. In the event that we are identified as an important data processor, we will take measures to fulfill applicable obligations under Draft CAC Regulations when they become effective.

On 20 August 2021, the SCNPC promulgated the PIP Law which took effect on 1 November 2021. The PIP Law sets forth detail rules on personal information protection requirements, including but not limited to more specific inform and consent requirements in various contexts, enhanced individual's rights, more protective obligations on personal data processors, and enhanced liability of violation of PIP Law and privacy litigation.

According to the PIP Law, personal information refers to any kind of information related to an identified or identifiable natural person as electronically or otherwise recorded, excluding information that has been anonymized. Processing of personal information includes the collection, storage, use, processing, transmission, provision, disclosure, and deletion of personal information. Processing of personal information shall be for a specified and reasonable purpose, and shall be conducted for a purpose directly relevant to the purpose of processing and in a way that has the least impact on personal rights and interests. Collection of personal information shall be limited to the minimum scope necessary for achieving the purpose of processing and shall not be excessive. A personal information processor may process personal information of an individual after acquiring the individual's consent which shall be a voluntary and explicit indication of intent given by such individual on a fully informed basis and shall

provide an easy way to withdraw consent. The processor could also process personal information without the individual's consent in the other circumstances prescribed under the PIP Law, such as the processing is necessary for the conclusion or performance of a contract to which the individual is a contracting party or for conducting human resource management under the labor rules and regulations developed in accordance with the law and a collective contract signed in accordance with the law; the processing is necessary to fulfill statutory functions or statutory obligations; etc. In the event that personal information is used by personal information processors in automated decision-making, transparency of the decision-making and fairness and impartiality of the results shall be ensured, and no unreasonable differential treatment of individuals in terms of transaction prices or other transaction terms may be implemented.

On 30 August 2019, the SAMR and the PRC Standardization Administration jointly promulgated the Information Security Technology—Guide for De-Identifying Personal Information (GB/T 37964-2019) (《信息安全技術－個人信息去標識化指南》) (the "**De-Identifying Guidelines**"), which became effective on 1 March 2020. The De-Identifying Guidelines are not laws but voluntary national standards widely cited by regulatory authorities as a reference in their enforcement activities. The De-Identifying Guidelines set forth the goals and principles of de-identifying and elaborate the methods and process of de-identifying from the technical perspective.

On 6 March 2020, the General Administration of Quality Supervision, Inspection and Quarantine of the PRC (part of which has been incorporated to form the SAMR) and the PRC Standardization Administration jointly promulgated the Information Security Technology—Personal Information Security Guidelines (GB/T 35273-2020) (《信息安全技術－個人信息安全規範》) (the "**Personal Information Security Guidelines**"), which became effective on 1 October 2020. The Personal Information Security Guidelines are not laws but voluntary national standards widely cited by regulatory authorities as a reference in their enforcement activities. It lays out granular guideline on how to obtain consent and how personal information should be collected, used and shared. Under the Personal Information Security Guidelines, personal information refers to any information that is recorded, electronically or otherwise, that can be used alone or in combination with other information to identify a natural person or reflect the activity of a natural person. The organization or person who is in a position to determine the purpose, means and similar measures of personal information processing (the "**PI Controller**") , among other things, is required to inform the natural person, who is identified by or associated with the personal information (the "**PI Subject**") of the purpose, method, scope and other rules for collecting and using such personal information and obtain consent from the PI Subject.

The Personal Information Security Guidelines also set forth requirements in relation to the PI Subject's rights in personal information processing activities, such as rights to consult, duplicate, correct, delete the information the PI Subject has provided, to withdraw the PI Subject's consent and to deregister their account. It also prescribes requirements for entrusted processing, sharing, transfer and public disclosure of personal information. Pursuant to the Personal Information Security Guidelines, after collecting the personal information, the controller of the personal information shall immediately conduct the data de-identification, implement the technical and administrative measures to store the de-identified data and the data separately which may be used to recover the identity of the persons and make sure not to identify the persons in the subsequent process of processing the personal information data.

On 22 June 2007, the Ministry of Public Security, the National Administration of State Secrets Protection, the State Cipher Code Administration and the Information Office of the State Council (repealed) promulgated the Administrative Measures for the Graded Protection of Information Security (《信息安全等級保護管理辦法》) (the "**Measures for the Graded Protection**"), effective from 22 June 2007, pursuant to which graded protection of state information security shall follow the principle of "independent grading and independent protection". Entities operating information systems shall determine the security protection grade of the information system pursuant to the Measures for the Graded Protection and the Guidelines for Grading of Classified Protection of Cyber Security (《網絡安全等級保護定級指南》) (the "**Guidelines for Grading**"), and report the grade to the relevant department for examination and approval. Pursuant to the Measures for the Graded Protection and the Guidelines for Grading, the grading of the classified protection of the information systems are determined based on two elements, namely what can be affected and how serious the consequences would be if the information systems are damaged. Specifically, the security protection grade of an information system shall be determined according to such factors as its level of importance to national security, economic development and social livelihood as well as its level of damage to national security, social order public interests and the legitimate rights and interests of citizens, legal persons and other organizations in case it is destroyed, according to which the security protection grade of an information system may be classified into the following five grades: (i) the Grade I information system, the destruction of which will cause damage to the legitimate rights and interests of citizens, legal persons and other organizations, but will cause no damage to national security, social order or public interests; (ii) the Grade II information system, the destruction of which will cause material damage to the legitimate rights and interests of citizens, legal persons and other organizations or cause damage to social order and public interests, but will not cause damage to national security; (iii) the Grade III information system, the destruction of which will cause material damage to social order and public interests or will cause damage to national security; (iv) the Grade IV information system, the destruction of which will cause particularly material damage to social order and public interests or will cause material damage to national security; and (v) the Grade V information system, the destruction of which will cause particularly material damage to national security.

For an information system determined to be Grade II or above, its operator shall make the record filing with relevant public security departments.

The entities operating information systems shall protect information systems pursuant to the Measures for the Graded Protection and the relevant technical standards and the state departments in charge of the supervision and administration of information security shall supervise and administer the graded protection work conducted by such entities. After the security protection grade of an information system is determined, its operator shall, in accordance with the norms for the administration of the graded protection of state information security and the relevant technical standards, use information technology products that conform to the relevant state provisions and satisfy the requirements on the protection grade for the security construction or reconstruction of the information system. In the process of constructing an information system, its operator shall synchronously construct the information security facilities that satisfy the requirements of the protection grade of the information system pursuant to certain technical standards. The entities operating an information system shall also formulate a security management system satisfying the requirements of the protection grade of the information system. After the information system is completed, the operators shall choose an

assessment agency to conduct assessment on the security grade status of the information system on a regular basis and also shall conduct self-inspections on the security status of the information system and the implementation of the security protection system and relevant measures on a regular basis.

The Guidelines for Grading also stipulates the procedures of the grading and specify the methods to grade the information system, including how to determine what can be affected and the degree of impact.

On 8 May 2017, the Supreme People's Court and the Supreme People's Procuratorate released the Interpretation of Several Issues Concerning the Application of Law in the Handling of Criminal Cases Involving Infringement of Citizens' Personal Information (《最高人民法院、最高人民檢察院關於辦理侵犯公民個人信息刑事案件適用法律若干問題的解釋》) (the "**Interpretations**"), effective from 1 June 2017. The Interpretations clarify several concepts regarding the crime of "infringement of citizens' personal information" stipulated by Article 253A of the Criminal Law of the PRC (《中華人民共和國刑法》), including "citizens' personal information", "violation of relevant national provisions", "provision of citizens' personal information" and "illegally obtaining any citizen's personal information by other methods". In addition, the Interpretations specify the standards for determining "serious circumstances" and "particularly serious circumstances" of this crime.

Pursuant to the Law of the PRC on Guarding State Secrets (2010 Revision) (《中華人民共和國保守國家秘密法(2010修訂)》) promulgated on 29 April 2010, and became effective from 1 October 2010, the regulators and policy makers shall mark state secret on all the media that carry information related to state secrets, while the information does not involve state secrets, it shall not be marked as state secrets. When engaged in our business, the Company did not see any state secret mark on the carries.

REGULATIONS ON RADIO AND TELEVISION PROGRAMS

According to the Regulations on Radio and Television Administration (《廣播電視管理條例》) promulgated by the State Council on 11 August 1997 and last amended on 29 November 2020, broadcasting and television program production and operation units may be established after obtaining approval from broadcasting stations, television stations, and departments of broadcasting and television administration of people's governments at or above the provincial level. Broadcasting and television programs can only be produced by broadcasting stations, television stations and broadcasting and television program production and operation units. No broadcasting and television stations shall broadcast broadcasting and television program produced by units without the licenses for broadcasting and television program production and operation. Pursuant to the Provisions for the Administration of the Production and Distribution of Radio and Television Programmes (《廣播電視節目製作經營管理規定》), which was promulgated by the State Administration of Press, Publication, Radio, Film and Television (the "**SARFT**") on 19 July 2004 and amended by the SARFT on 28 August 2015, and 29 October 2020, a Radio and Television Program Production and Operation Permit (《廣播電視節目製作經營許可證》) shall be obtained for engaging in the activities of production and operation of radio and television programs.

Sinohealth Information has obtained the Radio and Television Program Product and Operation Permit.

REGULATIONS ON PUBLISHING

Relevant Licenses for Publishing

The State Council promulgated the Administrative Regulations on Publishing (2001 Revision) (《出版管理條例(2001)》) on 25 December 2001, which was last amended on 29 November 2020. Pursuant to the Administrative Regulations on Publishing, institutions conducting the wholesale business of publications shall obtain the Publications Operation License (《出版物經營許可證》) from the publication administration authorities at provincial level, while institutions carrying on the retail business of publications shall obtain the Publications Operation License from the publication administration authorities at county level. The Provisions on the Administration of the Publication Market (2016) (《出版物市場管理規定(2016)》), jointly promulgated on 31 May 2016 by the State Administration of Press, Publication, Radio, Film and Television and MOFCOM, applies to the wholesale, retail, lease and exhibition of publications and also contains licensing requirements for the wholesale and retail of publications.

Sinohealth Information has obtained the Publications Operation License.

The Content of Publications

Pursuant to the Administrative Regulations on Publishing, no publication shall contain the following contents: (i) those opposing the basic principles established in the Constitution; (ii) those endangering the unification, sovereignty and territorial integrity of the State; (iii) those divulging State secrets, harming national security, or impairing the honor and interests of the State; (iv) those inciting the enmity, discrimination of nationalities, jeopardizing the unity among the various ethnic groups, or violating the customs and habits of nationalities; (v) those spreading cults or superstitions; (vi) those disturbing social order and destroying social stability; (vii) those inciting pornography, gambling, violence or instigating a crime; (viii) those insulting or libeling others, violating the lawful rights and interests of others; (ix) those endangering social moralities or fine national cultural traditions; or (x) other contents which are prohibited by PRC laws and regulations. A publisher shall adopt a system of editor's responsibility to ensure that the contents of its publications conform to the provisions of applicable regulations.

REGULATIONS ON ADVERTISING

Pursuant to the PRC Advertising Law, the advertising agent may be subject to civil or administrative liabilities under the circumstances that (i) it knows or should have known that the advertisement are false but still provides advertisement design or production service or agent service or provides recommendation or certification; (ii) it is unable to provide the advertiser's true name and address or valid contact information where a false advertisement is published causing damage to interest of consumers; (iii) it knows or should have known that the advertisement is in violation of provisions under PRC Advertising Law but still produces, serves as an agent for, or publishes the advertisement; and (iv) it fails to verify the contents of advertisements.

REGULATIONS ON M&A RULES AND OVERSEAS LISTING

On 8 August 2006, six PRC regulatory agencies, including MOFCOM, the State-owned Assets Supervision and Administration Commission of the State Council, the SAT, the SAMR, the CSRC and the SAFE, issued the M&A Rules, which took into effect on 8 September 2006 and was amended by MOFCOM on 22 June 2009. The M&A Rules, among other things, require that if an overseas company established or controlled by PRC companies or individuals intends to acquire equity interests or assets of any other PRC domestic company affiliated with such PRC companies or individuals, such acquisition must be submitted to MOFCOM for approval. The M&A Rules also require offshore special purpose vehicles formed for overseas listing purposes through acquisitions of PRC domestic companies and controlled by PRC companies or individuals, to obtain the approval of CSRC prior to publicly listing their securities on an overseas stock exchange. After the FIL and its implementation regulations became effective on 1 January 2020, the provisions of the M&A Rules remain effective to the extent they are not inconsistent with the FIL and its implementation regulations.

On 24 December 2021, the CSRC published the Administrative Provisions of the State Council on the Overseas Issuance and Listing of Securities by Domestic Enterprises (Draft for Comments) (《國務院關於境內企業境外發行證券和上市的管理規定(草稿徵求意見稿)》) (the "**Draft Administrative Provisions**"), and the Administrative Measures for Record-filings of the Overseas Issuance and Listing of Securities by Domestic Companies (Draft for Comments) (《境內企業境外發行證券和上市備案管理辦法(徵求意見稿)》) (the "**Draft Measures for Record-filing**", together with the Draft Administrative Provisions, the "**Drafts relating to Overseas Listings**"), which are open for public comments until 23 January 2022. The Drafts relating to Overseas Listings have not yet come into force. Pursuant to the Drafts relating to Overseas Listings, PRC domestic enterprises that directly or indirectly offer or list their securities in an overseas market, which include (i) any PRC joint stock companies; and (ii) any offshore company that conducts its business operations primarily in China and contemplates to offer or list its securities in an overseas market based on its onshore equities, assets or similar interests, are required to file with the CSRC within three business days after submitting their listing application documents to the relevant regulator in the place of intended listing. The Drafts relating to Overseas Listings also stipulate certain circumstances in which overseas listing should not be allowed. Failure to complete the filing under the Administrative Provisions may subject a PRC domestic company to a warning and a fine of RMB1 million to RMB10 million. Under serious circumstances, the PRC domestic company may be ordered to suspend its business or suspend its business until rectification, or its permits or businesses license may be revoked.

On 2 April 2022, the CSRC published the Provisions on Strengthening Confidentiality and Archives Administration of Overseas Securities Offering and Listing by Domestic Companies(Drafts for Comments) (《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(徵求意見稿)》) (the "**Draft Provisions on the Confidentiality and Archives**") for public comments. The Draft Provisions on the Confidentiality and Archives is to revise the Provisions on Strengthening Confidentiality and Archives Administration of Overseas Issuance and Listing of Securities (《關於加強在境外發行證券與上市相關保密和檔案管理工作的規定》) which was promulgated on 20 October 2009 (the "**2009 Provisions**"). The Draft Provisions on the Confidentiality and Archives expands the scope of domestic enterprises in the 2009 Provisions to domestic joint-stock enterprises listed on the overseas markets via direct offering,

or domestic operational entities of enterprises listed on the overseas markets via indirect offering (the "**Domestic Enterprises**"), being consistent with the Drafts relating to Overseas Listings. Pursuant to the Draft Provisions on the Confidentiality and Archives, Domestic Enterprises that either directly or through its overseas listing entity, publicly disclose or provide relevant entities or individuals including securities companies, securities service providers, and overseas regulators (the "**Relevant Entities**"), with documents and materials that contain state secrets or government work secrets, shall first obtain approval from competent authorities, and file with the secrecy administrative department at the same level. Where there is ambiguity or dispute over the identification of a state secret or a government work secret, a request shall be submitted to the competent secrecy administrative department for determination. Besides, Domestic Enterprises that either directly or through its overseas listing entity, publicly disclose or provide relevant entities with documents and materials that, if divulged, will jeopardize national security or public interest, shall strictly fulfill relevant procedures stipulated by applicable national regulations. As compared to the 2009 Provisions, the Draft Provisions on the Confidentiality and Archives further stipulates relevant requirements including (i) Domestic Enterprises shall also provide written statement regarding the compliance with relevant requirements under the Draft Provisions on the Confidentiality and Archives if they provide documents or materials to securities companies or securities service providers; (ii) Domestic Enterprises that discover any divulgence or possible divulgence of state secrets, shall immediately take remedial actions and report to relevant authorities; and (iii) Domestic Enterprises that provide the Relevant Entities with accounting archives or copies of accounting archives that have important conservation value to the nation and the society shall fulfill due procedures in compliance with relevant national regulations.

REGULATIONS ON FOREIGN EXCHANGE CONTROL

Foreign Currency Exchange

Pursuant to the Foreign Exchange Administrative Regulations of the PRC (《中華人民共和國外匯管理條例》) promulgated by the State Council on 29 January 1996, which became effective on 1 April 1996 and last amended on 5 August 2008, and the Administrative Regulations on Foreign Exchange Settlement, Sales and Payment (《結匯、售匯及付匯管理規定》) promulgated by the People's Bank of China on 20 June 1996 and which became effective on 1 July 1996, Renminbi is freely convertible for payments of current account items such as trade and service-related foreign exchange transactions and dividend payments after the relevant financial institutions have reasonably examined the authenticity of the transactions and their consistency with foreign exchange receipts and payments, but are not freely convertible for capital expenditure items such as direct investment, loans or investments in securities outside the PRC unless the approval of the SAFE or its local counterparts is obtained in advance.

On 30 March 2015, the SAFE promulgated the Circular on Reforming the Administration Measures on Conversion of Foreign Exchange Registered Capital of Foreign-invested Enterprises (《國家外匯管理局關於改革外商投資企業外匯資本金結匯管理方式的通知》) (the "**SAFE Circular 19**"), which came into effect on 1 June 2015 and replaced the Circular on Issues Relating to the Improvement of Business Operations with Respect to the Administration of Foreign Exchange Capital Payment and Settlement of Foreign-invested Enterprises (《國家外匯管理局關於完善外商投資企業外匯資本金支付結匯管理有關業務操作問題的通知》) (the "**SAFE Circular 142**"). The SAFE further promulgated the Circular 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 "**SAFE Circular 16**") on 9 June 2016, which, among other things, amended certain provisions of the SAFE Circular 19. The SAFE Circular 19 and the SAFE Circular 16 removed certain restrictions previously provided under the SAFE Circular 142 on the conversion by a foreign-invested enterprise of its capital denominated in foreign currency into Renminbi and the use of such Renminbi and allowed foreign invested enterprises to settle their foreign currency-denominated capital at their discretion based on actual needs of their business operations. According to the SAFE Circular 19 and the SAFE Circular 16, the flow and use of the Renminbi capital converted from foreign currency denominated registered capital of a foreign-invested company is regulated such that Renminbi capital may not be used for business beyond its business scope or to provide loans to persons other than affiliates unless otherwise permitted under its business scope. Violations of the SAFE Circular 19 or the SAFE Circular 16 could result in administrative penalties.

On 26 January 2017, the SAFE promulgated the Notice on Improving the Check of Authenticity and Compliance to Further Promote Foreign Exchange Control (《關於進一步推進外匯管理改革完善真實合規性審核的通知》) (the "**SAFE Circular 3**"), which stipulates several capital control measures with respect to the outbound remittance of profit from domestic entities to offshore entities, including (i) under the principle of genuine transactions, banks shall check board resolutions regarding profit distribution, the original version of tax filing records and audited financial statements; and (ii) domestic entities shall hold income to account for previous years' losses before remitting profits. Moreover, pursuant to the SAFE Circular 3, domestic entities shall make detailed explanations of the sources of capital and utilization arrangements, and provide board resolutions, contracts and other proof when completing the registration procedures in connection with an outbound investment.

On 23 October 2019, the SAFE promulgated the Circular on Further Promoting the Facilitation of Cross-border Trade and Investment (《國家外匯管理局關於進一步促進跨境貿易投資便利化的通知》), which expressly allows foreign-invested enterprises that do not have equity investments in their approved business scope to use capital obtained from foreign exchange settlement to make domestic equity investments as long as there is an authentic investment and such investment is in compliance with the foreign investment-related laws and regulations.

Regulations on Foreign Exchange Registration of Overseas Investment by PRC Residents

On 4 July 2014, the SAFE promulgated the Circular 37 for the purpose of simplifying the approval process, and for the promotion of cross-border investment. Under the Circular 37, (i) before PRC residents or entities invest in offshore special purpose vehicles with their legitimate onshore and offshore assets or equities, they must register with local SAFE branches with respect to their investments; and (ii) following the initial registration, they must update their SAFE registrations when the offshore special purpose vehicle undergoes material events relating to any change of basic information (including change of such PRC citizens or residents, name and operation term, increases or decreases in investment amount, transfers or exchanges of shares, or mergers or divisions).

The SAFE further promulgated the Circular 13 on 13 February 2015, which came into effect on 1 June 2015 and allows PRC residents or entities to register with qualified banks in connection with their establishment or control of an offshore entity established for the purpose of

overseas investment or financing. The SAFE and its branches shall perform indirect regulation over the foreign exchange registration via qualified banks. In the event that a PRC shareholder holding interests in a special purpose vehicle fails to fulfill the required SAFE registration, the PRC subsidiaries of that special purpose vehicle may be prohibited from distributing profits to the offshore parent and from carrying out subsequent cross-border foreign exchange activities, and the special purpose vehicle may be restricted in its ability to contribute additional capital into its PRC subsidiary.

REGULATIONS ON OUTBOUND DIRECT INVESTMENT

On 26 December 2017, the NDRC promulgated the Administrative Measures on Overseas Investments by Enterprises (《企業境外投資管理辦法》), which took effect on 1 March 2018. According to it, non-sensitive overseas investment projects are required to make record filings with the local branch of the NDRC. On 6 September 2014, MOFCOM promulgated the Administrative Measures on Overseas Investments (《境外投資管理辦法》), which took effect on 6 October 2014. According to such regulation, overseas investments of PRC enterprises that involve non-sensitive countries and regions and non-sensitive industries must make record filings with a local branch of MOFCOM. The Notice of the State Administration of Foreign Exchange on Further Improving and Adjusting Foreign Exchange Administration Policies for Direct Investment (《國家外匯管理局關於進一步簡化和改進直接投資外匯管理政策的通知》) was issued by SAFE on 13 February 2015 and became effective on 1 June 2015, under which PRC enterprises must register for overseas direct investment with local banks. The shareholders or beneficial owners who are PRC entities are required to be in compliance with the related overseas investment regulations. If they fail to complete the filings or registrations required by overseas direct investment regulations, the relevant authority may order them to suspend or cease the implementation of such investment and make corrections within a specified time.

REGULATIONS ON LEASING

Pursuant to the Law on Administration of Urban Real Estate of the PRC (《中華人民共和國城市房地產管理法》) promulgated by the SCNPC on 5 July 1994 and last amended on 26 August 2019 and became effective on 1 January 2020, when leasing premises, the lessor and lessee are required to enter into a written lease contract, containing such provisions as the leasing term, use of the premises, rental and repair liabilities, and other rights and obligations of both parties. Both lessor and lessee are also required to register the lease with the real estate administration department. If the lessor and lessee fail to go through the registration procedures, both lessor and lessee may be subject to fines.

REGULATIONS ON INTELLECTUAL PROPERTY

Trademarks

The Trademark Law of the PRC (《中華人民共和國商標法》) was promulgated in August 1982, amended on 22 February 1993, 27 October 2001, 30 August 2013 and last amended on 23 April 2019 and which came into effect on 1 November 2019, and Implementation Regulations on the Trademark Law of the PRC (《中華人民共和國商標法實施條例》) was promulgated on 3 August 2002 by the State Council and amended on 29 April 2014. These laws and regulations provide the basic legal framework for the regulations of trademarks in the PRC. In the PRC, registered trademarks include commodity trademarks, service trademarks, collective marks and certificate marks.

Domain Names

Internet domain name registration and related matters are primarily regulated by the Measures on Administration of Domain Names for the Chinese Internet (《中國互聯網絡域名管理辦法》) promulgated by the MII on 5 November 2004 and which took effect on 20 December 2004, which was superseded by the Measures on Administration of Internet Domain Names (《互聯網域名管理辦法》) promulgated by the MIIT on 24 August 2017 and which came into effect on 1 November 2017. Domain name owners are required to register their domain names and the MIIT is in charge of the administration of PRC internet domain names. The domain name services follow a "first come, first file" principle. Applicants for registration of domain names shall provide their true, accurate and complete information of such domain names to and enter into registration agreements with domain name registration service institutions. The applicants will become the holders of such domain names upon the completion of the registration procedure.

Patents

According to the Patent Law of the PRC (《中華人民共和國專利法》) promulgated by the SCNPC on 12 March 1984, which was last amended on 17 October 2020 and took effect on 1 June 2021, and its Implementation Rules (Revision 2010) (《中華人民共和國專利法實施細則(2010年修訂)》) last amended by the State Council on 9 January 2010 and took into effect on 1 February 2010, the National Intellectual Property Administration 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". Invention patents are valid for twenty years, while utility model patents are valid for ten years and design patents are valid for fifteen years, from the date of application.

Copyright

Pursuant to the Copyright Law of the PRC (《中華人民共和國著作權法》) promulgated by the SCNPC on 7 September 1990, implemented on 1 June 1991 and amended on 27 October 2001, 26 February 2010 and 11 November 2020 (the latest revision took effective on 1 June 2021) and the Implementing Regulations of the Copyright Law of the PRC (《中華人民共和國著作權法實施條例》) promulgated by the State Council on 2 August 2002, amended on 8 January 2011 and 30 January 2013 (the latest revision became effective on 1 March 2013), PRC nationals, legal persons, and other organizations shall enjoy copyright in their works, whether published or not, which include, among others, works of literature, art, natural science, social science, engineering technology and computer software. The copyright owner enjoys various kinds of rights, including right of publication, right of authorship and right of reproduction.

In order to further implement the Regulations for the Protection of Computer Software (《計算機軟件保護條例》) promulgated by the State Council on 20 December 2001 and last amended on 30 January 2013, the State Copyright Bureau issued the Registration of Computer Software Copyright Procedures (《計算機軟件著作權登記辦法》) on 20 February 2002, which applies to software copyright registration, license contract registration and transfer contract registration with respect to software copyright.

REGULATIONS ON TAXATION

Corporate Income Tax

According to the CIT Law, a unified income tax rate of 25% will be applied towards foreign investment and foreign enterprises which have set up institutions or facilities in the PRC as well as PRC enterprises. Under the CIT Law, enterprises established outside of China whose ''de facto management bodies'' are located in China are considered ''resident enterprises'' and will generally be subject to the unified 25% corporate income tax rate as to their global income.

Enterprises that are recognized as High and New Technology Enterprises in accordance with the Administrative Measures for the Determination of High and New Tech Enterprises (《高新技術企業認定管理辦法》) issued by the Ministry of Science, the MOF and the SAT are entitled to enjoy a preferential corporate income tax rate of 15%. The validity period of the High and New Technology Enterprise qualification is three years from the date of issuance of the certificate. An enterprise can re-apply for recognition as a High and New Technology Enterprise before or after the previous certificate expires.

Withholding tax on dividend distribution

Furthermore, pursuant to the CIT Law and the Implementation Rules on the Corporate Income Tax of the PRC (《中華人民共和國企業所得稅法實施條例》) which was promulgated on 6 December 2007 and with effect from 1 January 2008 and amended on 23 April 2019, a withholding tax rate of 10% will be applicable to any dividend payable by foreign-invested enterprises to their non-PRC enterprise investors. In addition, pursuant to the Arrangement between Mainland 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 on 21 August 2006 and applicable in Hong Kong to income derived in any year of assessment commencing on or after 1 April 2007 and in mainland China to any year commencing on or after 1 January 2007, a company incorporated in Hong Kong will be subject to withholding income tax at a rate of 5% on dividends it receives from its PRC subsidiaries if it holds a 25% or more of equity interest in each such PRC subsidiary at the time of the distribution, or 10% if it holds less than a 25% equity interest in that subsidiary. According to the Notice of the SAT on Issues regarding the Implementation of Dividend Provisions in Tax Treaties (《國家稅務總局關於執行稅收協定股息條款有關問題的通知》), which was promulgated on 20 February 2009, recipients of dividends paid by PRC enterprises must satisfy certain requirements in order to obtain a preferential income tax rate pursuant to a tax treaty, one such requirement is that the taxpayer must be the ''beneficiary owner'' of relevant dividends. In order for a corporate recipient of dividends paid by a PRC enterprise to enjoy preferential tax treatment pursuant to a tax treaty, such recipient must be the direct owner of a certain proportion of the share capital of the PRC enterprise at all times during the 12 months preceding its receipt of the dividends. In addition, the Announcement of the State Administration of Taxation on Issues concerning the ''Beneficial Owner'' in Tax Treaties (《國家稅務總局關於稅收協定中「受益所有人」有關問題的公告》) promulgated on 3 February 2018 and effective 1 April 2018, defined the ''beneficial owner'' as a person who owns or controls income or the rights or property based on which the income is generated, and introduced various factors to adversely impact the recognition of such "beneficiary owners". On 14 October 2019, the SAT issued the "Announcement of the SAT on Issuing the Administrative Measures for Non-resident

Taxpayers' Enjoyment of Treaty Benefits" (《非居民納稅人享受協定待遇管理辦法》) (the "**Circular 35**"), effective from 1 January 2020, which applies to entitlement to tax treaty benefits by non-resident taxpayers incurring tax payment obligation in the PRC. According to the Circular 35, if non-resident taxpayers determine through self-assessment that they are eligible for treaty benefits, they may enjoy tax treaty benefits when filing tax returns, or when withholding agents file withholding returns, and they should collect and retain relevant materials for review in accordance with the Circular 35 and accept the follow-up administration of tax authorities. Also, all levels of tax authorities shall, through strengthening follow-up administration for non-resident taxpayers' entitlement to tax treaty benefits, implement tax treaties and international transport agreements accurately, and prevent abuse of tax treaties and tax evasion and tax avoidance risks.

Value-added Tax

According to Provisional Regulations of the PRC on Value-added Tax (《中華人民共和國增值稅暫行條例》), which was promulgated by the State Council on 13 December 1993, came into effect on 1 January 1994, and was last amended on 19 November 2017, and the Implementation Rules for the Provisional Regulations on Value-added Tax of the PRC (《中華人民共和國增值稅暫行條例實施細則》) promulgated by the MOF on 25 December 1993 and amended on 15 December 2008 and 28 October 2011, organizations and individuals engaging in sale of goods or processing, repair and assembly services, sale of services, intangible assets, immovable and importation of goods in the PRC shall pay value-added tax.

Corporate Income Tax on Indirect Transfer of Non-Resident Enterprises

On 10 December 2009, the SAT issued the Notice on Strengthening the Administration of Corporate Income Tax Concerning Proceeds from Equity Transfers by Non-Resident Enterprises (《國家稅務總局關於加強非居民企業股權轉讓所得企業所得稅管理的通知》) (the "**SAT Circular 698**"). By promulgating and implementing the SAT Circular 698, the PRC tax authorities have enhanced their scrutiny over the indirect transfer of equity interests in a PRC resident enterprise by a non-resident enterprise. The SAT further issued the Announcement on Several Issues Concerning Corporate Income Tax for Indirect Transfer of Assets by Non-Resident Enterprises (《國家稅務總局關於非居民企業間接轉讓財產企業所得稅若干問題的公告》) (the "**SAT Circular 7**") on 3 February 2015, to supersede existing provisions in relation to the indirect transfer as set forth in the SAT Circular 698. The SAT Circular 7 introduced a tax regime that is significantly different from that under the SAT Circular 698. The SAT Circular 7 extends its tax jurisdiction to capture not only indirect transfer as set forth under the SAT Circular 698 but also transactions involving transfer of immovable property in China and assets held under the establishment and place, in China of a foreign company through the offshore transfer of a foreign intermediate holding company. The SAT Circular 7 also provides clearer criteria than the SAT Circular 698 on how to assess reasonable commercial purposes and introduces safe harbor scenarios applicable to internal group restructurings. Where a non-resident enterprise indirectly transfers equity interests or other assets of a PRC resident enterprise by implementing arrangements that are not for reasonable commercial purposes to avoid its obligation to pay corporate income tax, such an indirect transfer shall, in accordance with the CIT Law, be recognized by the competent PRC tax authorities as a direct transfer of equity interests or other assets by the PRC resident enterprise.

On 17 October 2017, the SAT promulgated the Announcement on Matters Concerning Withholding at Source of Income Tax of Non-resident Enterprises (《國家稅務總局關於非居民企業所得稅源泉扣繳有關問題的公告》) (the "**SAT Circular 37**"), which came into force and replaced the SAT Circular 698 and certain other regulations on 1 December 2017 and partly amended on 15 June 2018. The SAT Circular 37 does, among other things, simplify procedures of withholding and payment of income tax levied on non-resident enterprises. Under the SAT Circular 7 and the Law on the Administration of Tax Collection of the PRC (《中華人民共和國稅收徵收管理法》) promulgated by the SCNPC on 4 September 1992 and newly amended on 24 April 2015, in the case of an indirect transfer of equity, entities or individuals obligated to pay the transfer price to the transferor shall act as withholding agents. If they fail to make withholding or withhold the full amount of tax payable, the transferor of equity shall declare and pay tax to the relevant tax authorities within seven days from the occurrence of tax payment obligation. Where the withholding agent does not make the withholding, and the transferor of the equity does not pay the tax payable amount, the tax authority may impose late payment interest on the transferor. In addition, the tax authority may also hold the withholding agents liable and impose a penalty of ranging from 50% to 300% of the unpaid tax on them. The penalty imposed on the withholding agents may be reduced or waived if the withholding agents have submitted the relevant materials in connection with the indirect transfer to the PRC tax authorities in accordance with the SAT Circular 7.

REGULATIONS ON EMPLOYMENT AND SOCIAL WELFARE

The Labor Contract Law

Pursuant to the Labor Law of the PRC (《中華人民共和國勞動法》) and the Labor Contract Law of the PRC (《中華人民共和國勞動合同法》) which were separately with effect from 1 January 1995 (latest amended on 29 December 2018) and 1 January 2008 (amended on 28 December 2012), respectively, labor contracts shall be concluded if labor relationships are to be established between the employer and the employees.

Social Insurance and Housing Provident Fund

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 28 October 2010 and with effect from 1 July 2011 and latest amended on 29 December 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 22 January 1999 and last amended on 24 March 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 Promulgation of the Pilot Programme for Implementing Consolidation 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 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 19 January 2017 and 6 March 2019, the maternity insurance and basic medical

insurance for employees shall be consolidated. An employer shall make registration with the local social insurance agency in accordance with the provisions of the Social Insurance Law of PRC. Moreover, an employer shall declare and make social insurance contributions in full and on time. Pursuant to the Regulations on Housing Provident Fund (《住房公積金管理條例》) which was promulgated on 3 April 1999 and amended on 24 March 2002 and 24 March 2019, employers shall undertake registration at the competent administrative center of housing provident fund and then, upon the examination by such administrative center of housing provident fund, undergo the procedures of opening the account of the housing provident fund for their employees at the relevant bank. Enterprises are also obliged to timely pay and deposit housing provident funds for their employees in the full amount.

Pursuant to the Reform Plan of the State Tax and Local Tax Collection Administration System (《國稅地稅徵管體制改革方案》), which was promulgated by the General Office of the Communist Party of China and the General Office of the State Council on 20 July 2018, from 1 January 2019, all social insurance premiums including premiums for the basic pension insurance, unemployment insurance, maternity insurance, work injury insurance and basic medical insurance will be collected by the tax authorities. According to the Notice by the General Office of the State Taxation Administration on Conducing the Relevant Work Concerning the Administration of Collection of Social Insurance Premiums in a Steady, Orderly and Effective Manner (《國家稅務總局辦公廳關於穩妥有序做好社會保險費徵管有關工作的通知》) promulgated on 13 September 2018 and the Urgent Notice of the General Office of the Ministry of Human Resources and Social Security on Implementing the Spirit of the Executive Meeting of the State Council in Stabilizing the Collection of Social Security Contributions (《人力資源和社會保障部辦公廳關於貫徹落實國務院常務會議精神切實做好穩定社保費徵收工作的緊急通知》) promulgated on 21 September 2018, all local authorities responsible for the collection of social insurance are strictly forbidden to conduct self-collection of historical unpaid social insurance contributions from enterprises. Notice of the State Administration of Taxation on Implementing Measures on Further Support and Serve the Development of Private Economy (《國家稅務總局關於實施進一步支持和服務民營經濟發展若干措施的通知》) promulgated on 16 November 2018 repeats that tax authorities at all levels may not organize self-collection of arrears of taxpayers including private enterprises in the previous years.

REGULATIONS ON ANTI-CORRUPTION AND ANTI-BRIBERY

Pursuant to the Anti-Unfair Competition Law of the PRC (《中華人民共和國反不正當競爭法》) promulgated by the SCNPC on 23 April 2019, a business operator shall not resort to bribery to seek a transaction opportunity or competitive advantage by offering money or goods or by any other means to (i) any employee of the counterparty in a transaction; (ii) any entity or individual entrusted by the counterparty in a transaction to handle relevant affairs; or (iii) any other entity or individual that takes advantage of powers or influence to influence a transaction. A business operator may expressly offer a discount to the counterparty or pay commissions to the intermediaries of a transaction in the course of transaction activities, which shall be properly recorded at both parties' accounting books. Any commercial bribery committed by an employee of a given operator will be deemed as conduct of such operator unless such operator has evidence that such act is not related to such operator's efforts in seeking a transaction opportunity or competitive advantage.