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**ANNOUNCEMENT IN RELATION TO THE
WITHHOLDING AND PAYMENT OF ENTERPRISE INCOME TAX
FOR NON-RESIDENT ENTERPRISE SHAREHOLDERS
IN RESPECT OF THE
FINAL DIVIDENDS FOR 2018, 2019 AND 2020**

Reference is made to the announcement dated 24 May 2019 issued by Joy City Property Limited (the “**Company**”) in relation to the Company’s arrangements for withholding and payment of enterprise income tax for non-resident enterprise shareholders on dividends (the “**Withholding Arrangements**”), the Company’s final results announcement for the year ended 31 December 2018 dated 19 March 2019, the Company’s final results announcement for the year ended 31 December 2019 dated 30 March 2020 and the Company’s final results announcement for the year ended 31 December 2020 dated 25 March 2021 (the “**Announcements**”).

As disclosed in the Announcements, in connection with the “Enterprise Income Tax Law of the PRC” (the “**Enterprise Income Tax Law**”) and the “Detailed Rules for the Implementation of the Enterprise Income Tax Law of the PRC” (the “**Implementation Rules**”), the Company and its certain offshore subsidiaries have applied to the relevant tax authorities for recognition of Chinese resident enterprises (the “**Application**”) in 2019 and the Company has implemented the Withholding Arrangements pursuant to the Enterprise Income Tax Law and the Implementation Rules for the Company’s final dividends for 2018, 2019 and 2020.

As of the date of this announcement, the Application has not been approved and after recent liaisons with the relevant tax authorities, the Company considered that the Application would unlikely be approved in the reasonably foreseeable period of time. As such, in order to focus the Group’s resources on the development of the Group’s business, the board of directors of the Company hereby advises that the Withholding Arrangements for enterprise income tax in respect of dividends for non-resident enterprise shareholders will be suspended and the deductions from the Company’s dividends for withholding enterprise income tax for non-resident enterprise shareholders of the Company will be suspended until further notice. The enterprise income tax for non-resident enterprise shareholders in

respect of the final dividends for 2018, 2019 and 2020 that have been withheld by the Company will be refunded to the relevant non-resident enterprise shareholders of the Company in respect of whom enterprise income tax had been withheld pursuant to the Withholding Arrangements. The expected payment date of the refunds for the enterprise income tax is on or around 3 March 2023.

Shareholders and investors should read this announcement carefully and pay attention to the Company's announcements. The Company assumes no liability whatsoever, and will not entertain any claims arising from any delay in or inaccurate determination of the status of the shareholders, or any disputes over the withholding arrangements.

By order of the Board
JOY CITY PROPERTY LIMITED
CHEN Lang
Chairman

The PRC, 17 February 2023

As at the date of this announcement, the Board comprises Mr. CHEN Lang as Chairman and non-executive Director; Mr. CAO Ronggen as executive Director; Mr. MA Dewei, Mr. LIU Yun and Mr. ZHU Laibin as non-executive Directors; and Mr. LAU Hon Chuen, Ambrose, GBS, JP, Mr. LAM Kin Ming, Lawrence and Mr. CHAN Fan Shing as independent non-executive Directors.