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## REGULATORY OVERVIEW

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Our business operations are primarily conducted in the PRC and are subject to extensive supervision and regulation of the government of the PRC. This section provides an overview of the key laws, regulations and legislation affecting key aspects of our business.

### REGULATIONS RELATING TO THE COMMUNICATION TECHNOLOGY SERVICES INDUSTRY

Pursuant to the Provisions on Supervision and Administration of Quality of Communication Construction Projects (《通信建設工程質量監督管理規定》) promulgated by the Ministry of Industry and Information Technology on 17 May 2018, construction units, survey units, design units, architectural units and supervision units of communication construction projects shall comply with the laws and regulations and relevant requirements on engineering and construction, fulfill their responsibilities and obligations in relation to the quality and be responsible for the same of construction projects.

Pursuant to the Measures for the Administration of Telecommunications Business License (《電信業務經營許可管理辦法》) promulgated by the Ministry of Industry and Information Technology on 3 July 2017, the strengthening of the management of telecommunications business license is proposed, and relevant provisions on the application, approval and use of telecommunications business license, regulation of business conduct, change and cancellation of business license and supervision and inspection of business license are provided.

Pursuant to the Cybersecurity Law of the PRC (《中華人民共和國網絡安全法》) promulgated by the Standing Committee of the National People's Congress on 7 November 2016, the construction or operation of a network or provision of services through a network shall, in accordance with the provisions of laws and administrative regulations and the mandatory requirements of national standards, take technical measures and other necessary measures to ensure the safe and stable operation of the network, effectively respond to network security incidents, prevent network illegal and criminal activities, and maintain the integrity, confidentiality and availability of network data.

Pursuant to the Regulations on the Management of Qualification for Construction Enterprises (《建築業企業資質管理規定》) promulgated by the Ministry of Housing and Urban-Rural Development on 22 January 2015 and amended on 13 September 2016 and 22 December 2018 the competent department of housing and urban-rural development under the State Council is responsible for the overall supervision and management of qualification for construction enterprise at state level, and an enterprise shall apply for such qualification in accordance with the conditions of its assets, principal personnel, performance of completed projects and technical equipment. After passing the examination and obtaining the qualification certificate of a construction enterprise, the enterprise may engage in construction activities within the scope as permitted under the qualification.

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Pursuant to the Measures for the Management of Bidding and Tendering of Communication Engineering Construction Projects (《通信工程建設項目招標投標管理辦法》) promulgated by the Ministry of Industry and Information Technology on 4 May 2014, the measures regulate the bidding and tendering activities of communication engineering construction projects in the PRC are provided, the electronic bidding and tendering of communication engineering construction projects in accordance with the Electronic Bidding Measures (《電子招投標辦法》) are encouraged, and the Information Platform for the Administration of Bidding and Tendering of Communication Engineering Projects is established by the Ministry of Industry and Information Technology to implement the informatisation management of bidding and tendering activities of communication engineering construction projects.

Pursuant to the Measures for Supervision and Administration of Telecommunications Network Operation (《電信網絡運行監督管理辦法》) promulgated by the Ministry of Industry and Information Technology on 24 April 2009, the enhancement of supervision and administration over telecommunications network operation is proposed, so as to ensure stable and reliable operation of telecommunications network.

Pursuant to the Measures for the Management of Telecommunications Construction (《電信建設管理辦法》) promulgated by the former Ministry of Information Industry and the National Development and Planning Commission on January 4, 2002, it is proposed to strengthen the overall planning and industry management of telecommunications construction, and promote the healthy and orderly development of the telecommunications industry, which applies to the new construction, reconstruction and expansion of public telecommunications networks, private telecommunications networks and radio and television transmission networks within China.

Pursuant to the Administrative Regulations on Telecommunications of the PRC (《中華人民共和國電信條例》) promulgated by the State Council on 25 September 2000 and amended on 29 July 2014 and 6 February 2016 respectively, it is proposed to regulate the order of the telecommunications market, safeguard the legitimate rights and interests of telecommunications users and telecommunications business operators, ensure the security of telecommunications networks and information, and promote the healthy development of the telecommunications industry.

### REGULATIONS RELATING TO FOREIGN INVESTMENT

The investment activities of foreign investors in the PRC are mainly regulated by the Catalogue of Industries to Encourage Foreign Investment (2022 Version)(《鼓勵外商投資產業目錄(2022年版)》) issued by the Ministry of Commerce and the NDRC on 27 December 2020 and become effective on 27 January 2021, and the Special Administrative Measures for Foreign Investment Entry (Negative List) (2021 Version)(《外商投資准入特別管理措施(負面清單)(2021年版)》) issued on 27 December 2021 and become effective on 1 January 2022. Industries not included in the Catalogue and the Negative List are generally open to foreign investment, unless explicitly restricted by other Chinese laws and regulations. Pursuant to the Catalogue and the Negative List, the communication technology services sector is generally open to foreign investment.

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### REGULATIONS RELATING TO FOREIGN EXCHANGE AND OFFSHORE INVESTMENTS

#### Foreign Exchange

The Administrative Regulations on the Management of Foreign Exchange of the PRC (《中華人民共和國外匯管理條例》) is the major regulation governing foreign exchange in China, which was promulgated by the State Council on 29 January 1996 and amended on 14 January 1997 and 5 August 2008, respectively. Under these regulations, payments for regular items (e.g. profit distribution, interest payments and trade and service-related foreign exchange transactions) may be made in foreign currency without the prior approval of the State Administration of Foreign Exchange (“SAFE”), subject to certain procedural requirements. Foreign institutions and foreign individuals who make direct investments in the country should register with the foreign exchange authorities after obtaining approval from the relevant authorities.

SAFE promulgated the Notice of State Administration of Foreign Exchange on Further Improvement and Adjustment of Foreign Exchange Management Policies for Direct Investment” (SAFE Circular No. 59)(《國家外匯管理局關於進一步改進和調整直接投資外匯管理政策的通知》(國家外匯管理局59號文)) on 19 November 2012 and amended on May 2015. Pursuant to this circular, the opening of various special purpose foreign exchange accounts (e.g. upfront fee account, foreign exchange capital account and margin account), reinvestment of RMB fund by foreign investors in China and remittance of foreign exchange profits and dividends by foreign enterprises to foreign shareholders are no longer subject to approval or verification by SAFE, and the same entity can open multiple capital accounts in different provinces. SAFE promulgated the Regulations on Foreign Exchange Administration of Onshore Direct Investment by Foreign Investors on 10 May 2013, amended on 10 October 2018, 30 December 2019 respectively, specifying that SAFE or its local branches shall manage foreign investors’ direct investment in China through registration, and that banks shall handle foreign exchange operations for direct investment in China based on the registration information provided by SAFE or its branches.

Pursuant to the Notice of the State Administration of Foreign Exchange on Further Simplifying and Improving Foreign Exchange Management Policies for Direct Investment (SAFE Circular No. 13)(《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》(國家外匯管理局13號文)) issued by SAFE on 13 February 2015, revised on 30 December 2019, foreign exchange registration under domestic direct investment and foreign exchange registration under overseas direct investment shall be directly examined and processed by banks in accordance with the SAFE Circular No. 13 and its appendix, Operational Guidelines for Foreign Exchange Business of Direct Investment, and SAFE and its branches shall exercise indirect supervision over the foreign exchange registration of direct investments through the above-mentioned banks.

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Pursuant to Notice of the State Administration of Foreign Exchange on Reforming the Management of Foreign Exchange Capital Settlement for Foreign Invested Enterprises (SAFE Circular No. 19)(《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》(國家外匯管理局19號文)) issued by SAFE on 30 March 2015, revised on 30 December 2019, 23 March 2023 respectively, foreign invested enterprises may settle foreign exchange capital funds at will pursuant to their actual business needs. Foreign-invested enterprises shall not use the foreign exchange capital funds settled in RMB for (1) expenditure outside the scope of business of foreign-invested enterprises or prohibited by laws and regulations; (2) direct or indirect use for securities investment; (3) granting entrusted loans or repaying inter-enterprise loans; (4) purchasing real estate for non-self use (except for real estate enterprises).

On 9 June 2016, SAFE issued the Notice of State Administration of Foreign Exchange on Reforming and Standardising the Management Policy of Settlement of Capital Items (SAFE Circular No. 16)(《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》(國家外匯管理局16號文)), which reiterates some of the rules contained in SAFE Circular 19. SAFE No. 16 provides that willful remittance is applicable to foreign exchange capital, foreign debt funds and funds repatriated from overseas listings, and that the RMB funds derived from the relevant remittance can be used to grant loans to related parties or repay inter-enterprise loans (including advances to third parties). However, there remains significant uncertainty in practice as to the interpretation and implementation of SAFE Circular 16.

### Overseas Investments

Pursuant to the Notice of the State Administration of Foreign Exchange on Relevant Issues concerning Foreign Exchange Administration of the Overseas Investment and Financing and Round-trip Investments by Domestic Residents through Special Purpose Vehicles promulgated by SAFE on 4 July 2014 (SAFE Circular No. 37)(《關於境內居民通過特殊目的公司境外投融資及返程投資外匯管理有關問題的通知》(國家外匯管理局37號文)), domestic residents are required to register with the local branch of SAFE in respect of their overseas investment and financing for the purpose of directly established or indirectly controlled overseas enterprises (i.e. special purpose vehicles within the meaning of SAFE Circular No. 37). SAFE Circular No. 37 further stipulates that a special purpose vehicle shall apply for registration of changes after a change in important matters such as capital increase or reduction by domestic individual resident, transfer or replacement of equity interests, and merger or demerger. If the PRC shareholders holding interests in a special purpose vehicle fail to register with SAFE as required, the PRC subsidiary of the special purpose vehicle will be prohibited from distributing dividends to its parent company outside of China and from conducting cross-border foreign exchange activities thereafter, and the special purpose vehicle's ability to inject additional capital into its PRC subsidiary may be restricted. In addition, failure to comply with the above SAFE registration requirements may also result in liability under PRC law for evasion of foreign exchange restrictions.

Pursuant to the SAFE Circular No. 13, the banks will directly examine and handle the foreign exchange registration under overseas direct investment in accordance with SAFE Circular No. 13 and its appendix, Operational Guidelines for Foreign Exchange Business of Direct Investment, and SAFE and its branches will exercise indirect supervision over the foreign exchange registration of direct investment through the above-mentioned banks.

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### REGULATIONS RELATING TO INTELLECTUAL PROPERTY

#### Patent

Pursuant to the Patent Law of the PRC (《中華人民共和國專利法》) promulgated by the Standing Committee of the National People's Congress on 12 March 1984 and amended on 4 September 1992, 25 August 2000, 27 December 2008 and 17 October 2020, respectively, and the Implementation Rules of the Patent Law of the PRC (《中華人民共和國專利法實施細則》) promulgated by the State Council on 15 June 2001 and amended on 28 December 2002, 9 January 2010, respectively, the State Intellectual Property Office of the PRC is responsible for the nationwide management of patents, and the patent administration departments of provincial, autonomous region or province-level municipal governments are responsible for the management of patents within their respective administrative region. The patent system in China adopts the first-to-file principle, i.e. if two or more applicants apply for a patent for the same invention or creation, the patent right is granted to the first applicant. To apply for a patent, an invention or utility model must meet three criteria: novelty, inventiveness and practicability. Invention patents are valid for 20 years, while design patents and utility model patents are valid for ten years, from the date of application. A third-party must obtain consent or a proper license from the patent owner to use the patent. Otherwise, the use constitutes an infringement of the patent rights.

#### Trademark

Pursuant to the Trademark Law of the PRC (《中華人民共和國商標法》) promulgated by the Standing Committee of the National People's Congress on 23 August 1982 and amended on 22 February 1993, 27 October 2001, 30 August 2013 and 23 April 2019 respectively, and the Implementation Rules of the Trademark Law of the PRC promulgated by the State Council on 10 March 1983 and amended on 3 August 2002, 29 April 2014 respectively, the Trademark Office under the State Administration for Industry and Commerce is responsible for the registration of trademarks and grants a validity period of ten years for each registered trademark. Trademark registrants may apply for renewal of their registrations, which are valid for the following ten years. A trademark registrant may allow another party to use its registered trademark by entering into a trademark licence contract. The trademark licence contract is required to be filed with the Trademark Office. As far as trademarks are concerned, Chinese trademark law adopts the first-to-file principle in dealing with trademark registrations. An application for registration of a trademark which is identical or similar to a trademark already registered, or preliminarily examined and approved for use by another person in respect of the same goods or services, or similar goods or services may be rejected. Any person applying for registration of a trademark shall not prejudice the existing prior rights of another person, nor shall he/she improperly register a trademark which is already in use by another person, and has a certain degree of influence.

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### Copyright

Pursuant to the Copyright Law of the PRC (《中華人民共和國著作權法》) promulgated by the Standing Committee of the National People’s Congress on 7 September 1990 and amended on 27 October 2001, 26 February 2010 and 11 November 2020, respectively, the creations of Chinese citizens, legal persons or unincorporated organisations, including intellectual works in the fields of literature, art and science that are original and can be expressed in a certain form, are entitled to copyright protection, regardless of whether they are published or not. Copyright holders enjoy a variety of rights, including the right to publish, the right to attribute and the right to reproduce.

Pursuant to the Regulations on the Protection of Computer Software (《計算機軟件保護條例》) promulgated by the State Council on 4 June 1991 and amended on 20 December 2001 and 30 January 2013 respectively, Chinese citizens, legal persons or other organisations are entitled to copyright in software developed by them in accordance with these regulations, regardless of whether it is published or not, and may apply for registration with the software registration agency recognised by the administrative department of copyright under the State Council. Pursuant to the Measures for Registration of Computer Software Copyright (《計算機軟件著作權登記辦法》) promulgated by the National Copyright Administration on 20 February 2002, the state-level copyright administration encourages software registration, and gives priority protection to the registered software. The National Copyright Administration is in charge of the nationwide management of software copyright registration, and the National Copyright Administration recognises the Copyright Protection Center of China as a software registration institution.

### Domain Name

Pursuant to the Internet Domain Name Administration Measures (《互聯網域名管理辦法》) promulgated by the Ministry of Industry and Information Technology on 24 August 2017, the Ministry of Industry and Information Technology shall supervise and manage the domain name services nationwide, and the Communications Administration of each province, autonomous region and municipality directly under the Central Government shall supervise and manage the domain name services within its administrative region. In principle, domain name registration services are provided on a “first-applied-first-registered” basis.

## REGULATIONS RELATING TO ENVIRONMENTAL PROTECTION

In order to mitigate or avoid environmental pollution caused by production and operation activities, enterprises operating in mainland China shall comply with the provisions of various environmental protection laws and regulations. The main Chinese laws and regulations on environmental protection include: the Law of the PRC on Environmental Protection promulgated by the Standing Committee of the National People’s Congress on 26 December 1989 and amended on 24 April 2014; the Law of the PRC on Prevention and Control of Air Pollution (《中華人民共和國大氣污染防治法》) which was promulgated on 5 September 1987 and amended on 29 August 1995, 29 April 2000, 29 August 2015 and 26 October 2018 respectively; the Law of the PRC on Prevention and Control of Noise Pollution (《中華人民共和國噪聲污染防治法》) which was promulgated on 24 December 2021; the Law of the PRC on the Prevention and Control of Water Pollution (《中華人民共和國水污染防治法》) which was promulgated on 11 May 1984 and amended on 15 May 1996, 28 February 2008 and 27 June 2017 respectively; and the Law of the PRC on the Prevention and Control of Environmental Pollution by Solid Waste (《中華人民共和國固體廢物污染環境防治法》) which was promulgated on 30 October 1995 and amended on 29 December 2004, 29 June 2013, 7 November 2016 and 29 April 2020 respectively.

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### REGULATIONS RELATING TO TAX

#### Enterprise Income Tax

The Enterprise Income Tax Law of the PRC (《中華人民共和國企業所得稅法》) promulgated by the Standing Committee of the National People’s Congress on 16 March 2007 and amended on 24 February 2017 and 29 December 2018, respectively, and the Regulations on the Implementation of the Law of the PRC on Enterprise Income Tax promulgated by the State Council on 6 December 2007 and amended on 23 April 2019 (collectively, the “EIT Law”), are the main regulations under which the enterprise income tax in China is levied. Pursuant to the EIT Law, all resident enterprises and non-resident enterprises with an establishment or a place of business in China, are subject to an Enterprise Income Tax Law rate of 25%, provided that such income is derived from the establishment or place of business in China, or such income is derived from outside China but has a physical connection with such establishment or place of business. Where a non-resident enterprise does not have an establishment or a place of business in China, or where it has set up an establishment or a place of business, but the income obtained is not effectively connected with such establishment or place of business, it is subject to an enterprise income tax rate of 10% on the income derived from mainland China. A resident enterprise is an enterprise established under the laws of China, or established under the laws of a foreign country or region, but with its “de facto management body” in China.

Pursuant to the Announcement on Certain Issues of Enterprise Income Tax on Indirect Transfer of Property by Non-Resident Enterprises (SAT Announcement No. 7) (《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》(國家稅務總局公告第7號)) issued by SAT on 3 February 2015 and revised in October and December 2017 respectively, where a non-resident enterprise indirectly transfers equity interests and other property of a PRC resident enterprise through the implementation of an arrangement that does not have a reasonable commercial purpose to avoid its enterprise income tax obligations, such indirect transfer transaction shall be re-characterised in accordance with the provisions of Article 47 of the Enterprise Income Tax Law, and be recognised as a direct transfer of equity and other property of a PRC resident enterprise.

#### Value Added Tax

Pursuant to the Provisional Regulations of the PRC on Value Added Tax (《中華人民共和國增值稅暫行條例》) promulgated by the State Council on 13 December 1993 and amended on 10 November 2008, 6 February 2016 and 19 November 2017 respectively, all units and individuals engaged in the sale of goods, the provision of processing, repair and fitting services, the sale of services, intangible assets, real estate and the import of goods in China shall pay value added tax in accordance with the law. Unless otherwise provided by the State Council, the value added tax rate is 17% for the sale of goods, 11% for the sale of basic telecommunications and construction, and 6% for the sale of services and other intangible assets.

Pursuant to the Notice on Adjustment of Value Added Tax Rates (《關於調整增值稅稅率的通知》) issued by the Ministry of Finance and the State Administration of Taxation on 4 April 2018 and effective on 1 May 2018, for taxpayers who engage in taxable sales of value added tax or import of goods where the tax rates of 17% and 11% were previously applicable, their respective tax rates were adjusted to 16% and 10%.

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Pursuant to the Announcement on Policies Relating to the Deepening of Reform of Value Added Tax (《關於深化增值稅改革有關政策的公告》) promulgated by the Ministry of Finance, the State Administration of Taxation and the General Administration of Customs on 20 March 2019 and effective on 1 April 2019, for taxable sales of value added tax or import of goods, where the tax rate of 16% was previously applied, the tax rate will be adjusted to 13%; and where the tax rate of 10% was previously applied, the tax rate will be adjusted to 9%.

### REGULATIONS RELATING TO LABOUR AND SOCIAL SECURITY

#### Labour

Pursuant to the Labour Law of the PRC (《中華人民共和國勞動法》), the Labour Contract Law of the PRC (《中華人民共和國勞動合同法》) and the Administrative Regulations on the Implementation of the Labour Contract Law of the PRC (《中華人民共和國勞動合同法實施條例》), labour relations between employers and employees must be established in written form. The regulations impose strict rules on the establishment of fixed-term employment contracts, the employment of temporary workers and the dismissal of workers by employers. Pursuant to these regulations, employers must ensure that their employees have the right to rest, and must pay them a wage that is not lower than the local minimum wage. Employers who violate the Labour Contract Law of the PRC and the Labour Law of the PRC are liable to fines and other administrative liabilities, in serious cases, criminal liabilities will be pursued.

#### Social Security

Major laws relating to social security include the Social Insurance Law of the PRC (《中華人民共和國社會保險法》), the Administrative Regulations on Work Injury Insurance (《工傷保險條例》), the Interim Measures on Maternity Insurance for Enterprise Employees (《企業職工生育保險試行辦法》), the Provisional Regulations on the Collection and Payment of Social Insurance Premiums (《社會保險費征繳暫行條例》) and the Regulations on the Administration of Housing Provident Fund (《住房公積金管理條例》). Chinese enterprises and organisations are required to provide welfare schemes for their employees, including pension insurance, unemployment insurance, maternity insurance, work injury insurance and healthcare insurance, housing provident fund and other welfare schemes.

Pursuant to the Social Insurance Law of the PRC (《中華人民共和國社會保險法》) promulgated on 28 October 2010 and amended on 29 December 2018, the employer shall apply to the local social insurance agency for social insurance registration within 30 days from the date of its establishment. The employer shall also apply for social insurance registration for its employees with the social insurance agency within 30 days from the date of employment. Any employer who violates the above regulations will be ordered to rectify within a certain period of time, failing which the employer and its directly responsible persons shall be liable for a fine.



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On 20 July 2018, the General Office of the Central Committee of the Communist Party of China and the General Office of the State Council issued the Programme of Reform of the National Taxation and Local Taxation System (《國稅地稅征管體制改革方案》)(hereinafter referred to as the “**Reform Programme**”). The Reform Programme advocates:

1. In accordance with the requirements of creating a new model before abandoning the old model, and no abandonment without creation, adhering to the principles of unified leadership, hierarchical management, overall design and step-by-step implementation, adopting the approach of hang up the plate in the first place and then implementing the “three determinations”, merging the national tax and local tax agencies and then taking over the responsibilities of collecting and managing social insurance premiums and non-tax income, and reforming the provincial (autonomous regions, municipalities directly under the central government, and cities under separate state planning, hereinafter collectively referred to as provinces) tax bureaus first, then solidly promoting the reform of the municipal-level (prefectures and leagues, hereinafter collectively referred to as the municipalities) tax bureau and county-level (cities, districts and banners, hereinafter collectively referred to as counties) tax bureau, placing greater emphasis on the implementation of each key works and each of the timing, so as to ensure the completion of the reform tasks by the end of 2018.
2. It is clarified that from 1 January, 2019, the basic pension insurance premiums, basic healthcare insurance premiums, unemployment insurance premiums, work injury insurance premiums, maternity insurance premiums and other social insurance premiums shall be handed over to the taxation department for unified collection.

### **Housing Provident Fund**

Pursuant to the Administrative Regulations on the Management of Housing Provident Fund (《住房公積金管理條例》) implemented on 3 April 1999 and amended on 24 March 2002 and 24 March 2019 respectively, newly established units shall register their housing provident fund contributions at the Housing Provident Fund Management Centre within 30 days from the date of establishment, and then reach out to the entrusted banks to complete the procedures for the establishment of housing provident fund accounts for their employees. If a unit employs an employee, it should register the contribution at the Housing Provident Fund Management Centre within 30 days from the date of employment, and then reach out to the above-mentioned bank to complete the procedures for sealing the housing provident fund account for the employee.

If a unit does not register for housing provident fund contributions, or does not set up housing provident fund accounts for its employees, it shall be ordered to do so within a certain period of time; if it fails to do so after the deadline, it shall be subject to a fine. If a unit fails to pay or underpays its housing provident fund after the deadline, the Housing Provident Fund Management Centre shall order a deadline for payment; if the unit still fails to pay after the deadline, it may apply to the People’s Court for enforcement.

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### REGULATIONS RELATING TO OVERSEAS LISTING

Pursuant to 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》)(the “**CSRC New Measures**”) promulgated by CSRC on 17 February 2023 and effective on 31 March 2023, overseas offerings and listings of a listing applicant must conduct and complete relevant filing procedures with the CSRC if (1) 50% or more of its operating revenue, total profit, total assets or net assets as recorded in its audited consolidated financial statements for the most recent financial year is being accounted for by domestic companies; and (2) the main parts of its business activities are conducted in the PRC, its principal places of business are located in the Mainland China, or the senior management in charge of its business operation and management are mostly Chinese citizens or domiciled in the PRC.

The Directors, the Sole Sponsor, and the PRC Legal Advisers are of the view that the **[REDACTED]** of the Company’s Shares is subject to the filing requirements under the CSRC New Measures based on the following reasons:

1. the Group has four subsidiaries incorporated in the PRC. In particular, for the year ended 31 December 2022, substantially all total operating revenue, total profit, and total assets were contributed by its PRC incorporated subsidiaries, of which Zhonggan Communication and GLP Technology were the largest contributors;
2. the Group, with its headquarters in Jiangxi Province of the PRC, is an integrated service provider and software developer. Its core business operations are mainly to provide telecommunications infrastructure services and digitalisation solution services to customers. These businesses are predominantly conducted, managed and located in the PRC; and
3. the executive Directors and senior management are mostly Chinese nationals, and they, together with the senior management team, reside predominantly in the PRC. Their close proximity to the Group’s operations in the PRC is important as they play a critical role in the supervision and management of the Group’s operations. The executive Directors and senior management team are responsible for the overall management, corporate strategy, planning, business development and control of the Group’s operations.

The Company completed the submission of the relevant filing materials to CSRC in accordance with the CSRC New Measures on 5 July 2023, which was within three working days after the submission of the **[REDACTED]** dated 30 June 2023. According to the Statement on Oversea Securities Offering and Listing by Domestic Companies as at 23 July 2023 (Initial public offering and full circulation)(《境內企業境外發行證券和上市備案情況表》(首次公開發行及全流通)(截至2023年7月27日)) issued by CSRC, the Company’s filing materials were accepted by the CSRC on 20 July 2023. The filing by the Company was approved by CSRC on 2 January 2024. As advised by the PRC Legal Advisers, the Company has completed the relevant filings for the application of the **[REDACTED]** and overseas offering, and no further approval from the CSRC is required to be obtained before the **[REDACTED]**.